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Transcript of Nate Moll

Date: March 9, 2022

Case: Krasno -v- Board of Regents of University of Wisconsin, et al.

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Transcript of Nate Moll
Conducted on March 9, 2022

1 (1 to 4)

1	3
1 IN THE UNITED STATES DISTRICT COURT	1 I N D E X
2 FOR THE WESTERN DISTRICT OF WISCONSIN	2 WITNESS: NATE MOLL PAGE
3 MADELINE KRASNO,)	3 Examination by Mr. Berry 7
4 Plaintiff,)	4 Examination by Mr. Kilpatrick 230
5 vs.) Case No.	5 E X H I B I T S
6 BOARD OF REGENTS OF THE) 21-CV-00099-SLC	6 NATE MOLL PAGE
7 UNIVERSITY OF)	6 Exhibit No. 20 45
8 WISCONSIN, et al.)	7 Exhibit No. 21 50
9 Defendants.)	7 Exhibit No. 22 108
10 VIDEOTAPED DEPOSITION OF NATE MOLL	8 Exhibit No. 23 111
11 Conducted Virtually	8 Exhibit No. 24 122
12	9 Exhibit No. 25 127
13 Wednesday, March 9, 2021	9 Exhibit No. 26 134
14 10:00 a.m. CST	10 Exhibit No. 27 138
15	10 Exhibit No. 28 139
16	10 Exhibit No. 29 142
17	11 Exhibit No. 30 144
18	11 Exhibit No. 31 150
19	12 Exhibit No. 32 153
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21	13 Exhibit No. 34 165
22 Reporter: Angela C. Loisi, CSR, RPR, FCRR	13 Exhibit No. 35 170
23 License No.: 084-004571	14 Exhibit No. 36 189
24 APPEARING REMOTELY FROM COOK COUNTY, ILLINOIS	14 Exhibit No. 37 198
25 JOB NUMBER: 434745	15 Exhibit No. 38 215
	15 Exhibit No. 39 221
	16 Exhibit No. 40 226
2	17
1 VIRTUAL APPEARANCES:	18
2 ANIMAL LEGAL DEFENSE FUND	19
3 BY: MR. CHRISTOPHER BERRY	20
4 MS. CAITLIN FOLEY	21
5 MS. JESSICA FARLEY	22
6 150 South Wacker Drive, Suite 2400	23
7 Chicago, Illinois 60606	24
8 (312) 795-2533	25
9 Cberry@aldf.org	
10 Cfoley@aldf.org	
11 Jfarley@aldf.org	
12 Representing the Plaintiff;	1 TECHNICIAN: Thank you to everyone for
13	2 attending this proceeding remotely which we
14 WISCONSIN DEPARTMENT OF JUSTICE	3 anticipate will run smoothly.
15 BY: MR. STEVEN C. KILPATRICK	4 Please remember to speak slowly and do
16 17 West Main Street, PO Box 7857	5 your best not to talk over one another.
17 Madison, Wisconsin 53707-7857	6 Please be aware we are recording this
18 (608) 266-1792	7 proceeding for backup purposes. Any
19 Kilpatricksc@doj.state.wi.us	8 off-the-record discussion should be had away
20 Representing the Defendants.	9 from the computer, and please remember to mute
21 ALSO PRESENT:	10 your mic for those conversations.
22 Craig Fischer, in-house counsel;	11 Please have your video enabled to help
23 Emily Dunn, technician;	12 the reporter identify who is speaking, and if
24 RJ Buckler, videographer;	13 you are unable to connect with the video and
25 Madeline Krasno;	14 are connecting via phone, please identify
	15 yourself each time before speaking.
	16 I apologize in advance for any
	17 technical-related interruptions.
	18 Thank you.
	19 VIDEOGRAPHER: Thank you. One moment.
	20 Here begins recording number 1 of the
	21 videotaped deposition of Nate Moll in the
	22 matter of Madeline Krasno versus Board of
	23 Regents of the University of Wisconsin, et
	24 al., held in the United States District Court
	25 for the Western District of Wisconsin. Case

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2 (5 to 8)

1 number 21-CV-00099-SLC.
2 Today's date is March 9, 2022. The
3 time on the video monitor is 10:05 a.m.
4 central U.S. time. The videographer today is
5 RJ Buckler, CVLS, representing Planet Depos.
6 This video deposition is taking place remotely
7 via Zoom.

8 Would counsel please voice identify
9 themselves and state whom they represent.

10 MR. BERRY: I am -- excuse me.

11 My name's Christopher Berry. I'm with
12 the Animal Legal Defense Fund representing
13 Plaintiff Madeline Krasno.

14 MR. KILPATRICK: I am assistant
15 Attorney General with the Wisconsin Department
16 of Justice, Steven Kilpatrick, representing
17 the defendants.

18 MS. FOLEY: Caitlin Foley with
19 Plaintiff Madeline Krasno.

20 MS. FARLEY: Jessica Farley on behalf
21 of Plaintiff Madeline Krasno.

22 MR. FISCHER: Craig Fischer on behalf
23 of Board of Regents.

24 VIDEOGRAPHER: The court reporter
25 today is Angela Loisi representing Planet

5
1 WHEREUPON:
2 NATE MOLL,
3 called as a witness herein, acknowledged their
4 testimony to be true under penalties of
5 perjury, was examined and testified as
6 follows:
7 EXAMINATION
8 BY MR. BERRY:
9 Q. All right. Good morning, Mr. Moll.
10 My name's Christopher Berry and I represent
11 the plaintiff, Madeline Krasno in the lawsuit.
12 What -- how would you prefer to be
13 called?
14 A. Yeah. Good morning. My name is Nate.
15 You can either -- my full name is Nathan, but
16 you can either refer to me as Nate or
17 Mr. Moll, pronounced mall, like shopping mall,
18 but with an "O."
19 Q. Okay. And can you spell your first
20 and last names for the record?
21 A. Yes. First name is Nate, N-A-T-E.
22 Last name Moll, M-O-L-L.
23 Q. And do you use any other names?
24 A. My legal first name is Nathan,
25 N-A-T-H-A-N. But I prefer to go by Nate.

6
1 Depos.
2 Would the court reporter please swear
3 in the witness.
4 STENOGRAPHER: Will counsel please
5 stipulate that in lieu of formally swearing in
6 the witness, the reporter will instead ask the
7 witness to acknowledge that their testimony
8 will be true under the penalties of perjury,
9 that counsel will not object to the
10 admissibility of the transcript based on
11 proceeding in this way, and that the witness
12 has verified that they are, in fact, Nate
13 Moll.

14 MR. KILPATRICK: I agree.

15 MR. BERRY: I agree to that as well.

16 STENOGRAPHER: Thank you.

17 And, Mr. Moll, do you hereby
18 acknowledge that your testimony will be true
19 under the penalties of perjury?

20 THE WITNESS: I do.

21 STENOGRAPHER: Thank you. Please, go
22 ahead.

23

24

25

8
1 Q. Okay. And you work for the University
2 of Wisconsin; correct?
3 A. Correct. University of
4 Wisconsin-Madison.
5 Q. And what's your position for the
6 University of Wisconsin-Madison?
7 A. Yeah. I work as the social media
8 manager in university communications.
9 Q. Have you ever been deposed before?
10 A. No.
11 Q. Have you ever testified in a legal
12 matter before in any way?
13 A. No.
14 Q. And -- and I'm -- let's see here.
15 I guess that you -- you may have met
16 with your attorney and talked about some of
17 what this is going to be like. But I want to
18 go over the form -- the format of the
19 deposition so we have an understanding of how
20 it will go. So that will just take a few
21 minutes here.
22 I'm here today to ask questions and
23 I'd ask that you answer them to the best of
24 your ability and your recollection. Do you
25 understand that?

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	9		11
1 A. Yes, I do.		1 A. Yes, I do.	
2 Q. And if I ask you a question and you		2 Q. I'm also going to refer to the	
3 don't understand, please let me know and I'll		3 university social media accounts, in	
4 do my best to clarify the question. Do you		4 particular, the Instagram account and the	
5 understand that?		5 Facebook account operated under the handle	
6 A. Yes.		6 @UW-Madison.	
7 Q. Additionally, if you don't ask for		7 Can we agree that when we're talking	
8 clarification, I'll assume that you understood		8 about the university social media accounts,	
9 the question and -- does that make sense?		9 we're referring to the @UW-Madison Instagram,	
10 A. Yes, it does.		10 Facebook accounts as opposed to other social	
11 Q. I'll do my best to take regular breaks		11 media account pages by other departments?	
12 during the deposition, but if you feel like			
13 you need a break, please let me know and we			
14 can take one.			
15 I would only ask that if the question			
16 is pending that you answer that question			
17 before we take a break. Do you understand			
18 that?			
19 A. Yes, I do. Thank you.			
20 Q. If at any point during today's			
21 deposition you realize that an answer that you			
22 gave earlier was inaccurate or maybe			
23 incomplete, or you just wish to elaborate on			
24 it, just let me know and I'll give you the			
25 opportunity to do that. Is that okay?			
	10		
1 A. Yes, it is.		1 change program university wide. So currently,	
2 Q. And I'd also ask that since the		2 my role is titled social media manager.	
3 deposition's being recorded by a reporter, you		3 Q. And did your job duties change with	
4 respond verbally when you answer a question as		4 that title change to social media manager?	
5 opposed to shaking your head or -- or making		5 A. No.	
6 some other body language. Do you understand		6 Q. How long -- how long have you had	
7 that?		7 your -- your current position as -- well, let	
8 A. Yes, I understand.		8 me rephrase the question.	
9 Q. All right. Are you taking any		9 When did you begin your position as a	
10 medication today that would affect your		10 social media specialist?	
11 ability to testify truthfully?		11 A. Yeah. I began in July of 2013.	
12 A. No.		12 Q. And when -- when did the title change	
13 Q. And is there any other reason why you		13 to social media manager?	
14 may not be able to testify fully or truthfully		14 A. I believe it was a few months ago.	
15 today?		15 Effectively, it's the same. It's the same	
16 A. No.		16 role, social media specialist and social media	
17 Q. Okay. Throughout the deposition, I'm		17 manager. It was just a title change for title	
18 going to refer to the University of		18 and total compensation, university-wide study.	
19 Wisconsin-Madison frequently.		19 Q. Through -- in this deposition I'll --	
20 But just for the ease of our		20 I'll refer to the title then as social media	
21 conversation, I'll refer to the University of		21 manager.	
22 Wisconsin-Madison as the university,		22 But we can -- we can understand, then,	
23 understanding that it refers to the University		23 that it -- it includes your time as a	
24 of Wisconsin-Madison. Do you -- do you		24 specialist as well. Do you -- would you	
25 understand that?		25 understand that?	

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	13		15
1 A. Yes, that's fine.		1 correct?	
2 Q. Okay. Just so we don't have to		2 A. Correct. July of 2013.	
3 segregate the two titles.		3 Q. Okay. In -- so in 2013, what -- what	
4 A. Yeah, I -- I agree.		4 social media accounts did you have -- did you	
5 Q. Have you held other positions at the		5 have access to for the university in your role	
6 university?		6 as a social media specialist?	
7 A. As a student, yes. But		7 A. In my professional role I had access	
8 professionally, no.		8 to university -- flagship university accounts	
9 Q. Can you -- can you work backwards		9 that represented the main institutional brand	
10 then, starting from the most recent position		10 and -- and news operations. So @uW-Madison,	
11 you held before becoming a social media		11 that would be on Facebook, Twitter, Instagram,	
12 specialist?		12 LinkedIn, Pinterest.	
13 A. Yeah. So as a student working		13 Q. And what was your role at that time,	
14 backwards, I was employed by the office of		14 in 2013, as a social media specialist with	
15 visitor and information programs as a social		15 access to those accounts?	
16 media specialist, as well as a campus tour		16 A. My role was to -- and continues to be	
17 guide.		17 the -- the point person or lead communicator	
18 And I was also employed by the		18 in charge of all aspects of account	
19 Wisconsin union as a creative team intern.		19 management. So producing content and	
20 Q. Can you repeat what department you		20 community management.	
21 were a social media specialist for as a		21 Q. Did you moderate comments	
22 student?		22 in -- as -- as early as 2013 as a social media	
23 A. Yes. Visitor information programs.		23 specialist?	
24 Q. What were your job duties at -- as a		24 A. Yes.	
25 social media specialist for the visitor and		25 Q. Okay. And can you -- can you describe	
	14		16
1 information program?		1 the job duties in your -- in your current	
2 A. It was -- yeah, as a social media		2 position?	
3 specialist for visitor information programs,		3 A. Yes. As I stated before, I am the	
4 my primary duties were to manage the social		4 lead point person for managing all aspects of	
5 media accounts that represented visitor		5 the social media accounts for @UW-Madison.	
6 information programs and -- and all -- all the		6 I also am a -- I lead the university	
7 duties associated with a social media account		7 communicators group and serve as a resource	
8 management.		8 when needed on all things social media and	
9 Q. Okay. And what -- what years were you		9 marketing and communications.	
10 a social media specialist for the visitor and		10 And I -- at the time -- or at --	
11 information programs?		11 from -- from time to time we also have social	
12 A. 2011 through 2013.		12 media interns that I supervise. Yeah.	
13 Q. And in what years were you a creative		13 Q. Okay. Is your -- is your position	
14 team intern for the Wisconsin union?		14 within a specific department at the	
15 A. I believe it was 2012.		15 university?	
16 Q. Okay. Did you have any jobs with the		16 A. Yes. University communications.	
17 university, other than the ones that -- that		17 Q. And is that department nested within	
18 you just listed?		18 another department?	
19 A. Not that I recall.		19 A. Yes. It's within university	
20 Q. Okay. And were you still a student		20 relations.	
21 when you started as a social media manager for		21 Q. And is university relations nested	
22 the university?		22 within another department?	
23 A. No.		23 A. I don't believe so. The -- the vice	
24 Q. That started in 2013 that you were a		24 chancellor for university relations, to my	
25 social media specialist for the university;		25 understanding, reports directly to the	

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	17		19
1 chancellor.		1 A. They read -- read the contents of the	
2 Q. Okay. And do any employees report		2 messages and either, you know, reply as needed	
3 directly to you?		3 or mark as done or send to me or another	
4 A. Not in their official -- well, sorry.		4 communicator on campus.	
5 "Any employees" could mean student		5 Q. Do they -- excuse me.	
6 employees. At this time, no, we don't have		6 Do the student interns have any	
7 any student interns.		7 responsibility to help moderate comments on	
8 I do work with other full-time staff		8 social media accounts?	
9 within university communications, but they		9 A. I believe in the past they have. Just	
10 don't report directly to me on an		10 on an as-needed basis. But it would be with	
11 organizational chart.		11 my, I guess, indirect supervision. You know,	
12 Q. But -- and you said that -- that		12 I would usually contact them directly if we	
13 students do report to you, though; is that		13 needed assistance. And I would -- you know, I	
14 correct?		14 would be there to answer questions or assist	
15 A. When we have student interns they can,		15 as needed.	
16 yes.		16 Q. And do they have the ability to	
17 Q. And how many -- how many student		17 directly manage -- excuse me.	
18 interns do you generally have at a given time?		18 Did the student interns have the	
19 A. It varies from year to year. But I		19 ability to -- to directly moderate themselves,	
20 have had up to three at --		20 then?	
21 Q. [Indiscernible].		21 A. With the account level access that	
22 (Indiscernible simultaneous		22 they were granted, they -- they had the	
23 colloquy.)		23 ability to.	
24 THE WITNESS: -- time.		24 Q. And what kinds of -- what types of	
25 BY MR. BERRY:		25 authority did they have to moderate under	
	18		20
1 Q. And how does it -- how does that vary		1 that -- those -- that account access?	
2 or...		2 A. They had -- sorry. Can you clarify	
3 A. It -- it varies based on, you know,		3 "authority"?	
4 need, funding, and availability.		4 Q. Yeah, and based on their abilities	
5 Q. And other than those student interns,		5 handling the social media accounts, what sort	
6 you don't -- you don't directly -- no one else		6 of moderation powers did they have access to?	
7 directs -- reports to you?		7 A. Based on their access level on either	
8 A. No.		8 Facebook or Instagram, they have the ability	
9 Q. What are the responsibilities of the		9 to reply or hide or delete comments or -- or	
10 student interns?		10 any other options granted to them by Facebook	
11 A. Student intern responsibilities are		11 or Instagram.	
12 primarily content creation where I assign them		12 Q. And what would those options have been	
13 projects to, you know, create campaigns or,		13 that the interns had the ability to do under	
14 you know, write -- write social copy or		14 Instagram or Facebook?	
15 special projects as needed throughout the		15 A. Other options -- so Facebook sets --	
16 year.		16 or -- and Instagram, but primarily Facebook.	
17 And they also assist in -- inbox		17 But they set levels of -- of access, I guess.	
18 management for our direct messages.		18 And so as far as I recall, the	
19 Q. Can you repeat that. What type of		19 abilities I previously mentioned were those	
20 management did they assist in?		20 available to them and -- but others that we	
21 A. Direct message. So managing -- or		21 probably didn't use very often included the	
22 helping to manage our -- our direct message		22 ability to report a comment. And that -- that	
23 inboxes.		23 ability is available to anybody, whether	
24 Q. How do they -- how do they help manage		24 you're an account administrator or member of	
25 the -- the direct message inboxes?		25 the public or a follower of the account, so	

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	21		23
1 long as you have a Facebook or Instagram		1 Q. In your current position, do you have	
2 account.		2 a primary responsibility for overseeing	
3 Q. Did the -- did the interns have the		3 operations of the university's social media	
4 ability to -- to block users?		4 accounts on Facebook and Instagram?	
5 A. I'm not sure if they had that ability		5 A. Yes, I do.	
6 at their account level access. I don't		6 Q. And how long have you been the primary	
7 recall.		7 person responsible for social media	
8 Q. But they did have the ability to reply		8 moderation?	
9 to -- excuse me. Let me rephrase the		9 A. Since my job began in July, 2013.	
10 question.		10 Q. What actions under moderation are you	
11 The student interns previously had the		11 responsible for?	
12 ability to reply to comments, hide comments,		12 A. What do you mean by "responsible for"?	
13 delete comments, and report comments relating		13 Q. What types -- what types of moderation	
14 to the university's social media accounts.		14 do you -- can you perform as the primary	
15 And beyond that, you're not sure if		15 person responsible for moderation?	
16 they had access to any other moderation		16 A. Well, they vary by social media	
17 privileges?		17 platform. Could you be more specific?	
18 MR. KILPATRICK: I'm going to object		18 Q. Yeah. Let's see. Sure. Can you just	
19 as a compound question.		19 describe the ways that someone can manually	
20 BY MR. BERRY:		20 moderate a user's comments on the university's	
21 Q. You can answer the question.		21 Instagram account.	
22 A. I'm sorry. Could you repeat that?		22 A. The way that an account administrator	
23 Q. So the -- the student interns had the		23 can moderate a user's comment on Instagram	
24 ability to -- to reply to comments, hide		24 include replying to the comment, deleting a	
25 comments, delete comments, and report comments		25 comment, reporting a comment. I believe those	
	22		24
1 relating to the university's social media		1 are the three options on a comment level	
2 accounts; is that correct?		2 that -- that administrators have access to.	
3 A. As far as I can recall, yes.		3 Q. Are you able to moderate comments by	
4 Q. And as far as you can recall, you're		4 hiding them from public view instead of	
5 not sure if they had the ability to perform		5 deleting them entirely?	
6 any other sort of moderation beyond the -- the		6 A. So there is an option that is at an	
7 replying to comments, deleting comments, and		7 account level to restrict an account. And if	
8 reporting comments?		8 a user is restricted on an account level, then	
9 A. As far as I can recall, yes.		9 an account administrator has the ability to	
10 Q. Who -- how many student interns do you		10 either approve the comment, delete the comment	
11 currently have, if any?		11 or leave it be.	
12 A. Zero.		12 Q. Is there -- is there any way to	
13 Q. Okay. When was the last time you had		13 hide -- hide a comment from public view where	
14 student interns?		14 the person making the comment would see their	
15 A. May 2020.		15 comment, but other people would not on	
16 Q. Who -- so going beyond who reports to		16 Instagram?	
17 you, my next question is, who do you report to		17 A. Sorry. Could you repeat the question?	
18 at the university?		18 Q. Yeah. On Instagram, are there any	
19 A. I report to Mike Klein.		19 circumstances where you can moderate comments	
20 Q. And what's Mike -- Mike Klein's title?		20 so that they still appear to the person who	
21 A. His title also recently changed. So I		21 made the comment, but other people cannot see	
22 don't recall his specific title as it is now		22 the comment?	
23 as opposed to a few months ago. But he is an		23 A. I believe that is a circumstance where	
24 editor, and I believe director of news		24 the user has that account level restriction so	
25 content.		25 the user who -- who wrote the comment can see	

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	25		27
1 it, but others cannot.		1 So on Facebook an admin has the	
2 Q. Okay. So when an Instagram user		2 ability to reply to a comment, delete a	
3 account is restricted by another Instagram		3 comment, report a comment. And unlike	
4 account, all the comments that the restricted		4 Instagram, on Facebook an admin has the	
5 user makes on that account are hidden from		5 ability to hide a comment on a	
6 everyone, except for the restricted user; is		6 comment-by-comment basis.	
7 that correct?		7 Q. On -- on Facebook can a -- can friends	
8 A. Yes.		8 see a restricted user's comments on Facebook	
9 Q. And so other Instagram users cannot		9 even if it -- even if other people cannot?	
10 see or reply to those comments?		10 A. Unlike Instagram, Facebook does not	
11 A. As far as I'm familiar with the		11 have restricted users. There is no account	
12 Instagram tool and settings, yes.		12 level restriction on Facebook like there is on	
13 Q. And if a -- if a restricted user		13 Instagram where I previously described the	
14 replies to other comments on the restricting		14 Instagram settings.	
15 Instagram account posts, other Instagram users		15 Q. Are you aware of any behavior, either	
16 will not be able to see or respond to those		16 on Instagram or Facebook, where -- where a	
17 replies; is that correct?		17 comment can be moderated so that -- so that	
18 A. I don't know. I'm sorry.		18 friends of the commentor can -- can see the	
19 Q. Do you -- okay.		19 comment, but nobody else can?	
20 If a -- now, earlier		20 A. Yes, I am.	
21 you -- you mentioned that you can place an		21 Q. Is that special to Facebook, but	
22 account level restriction. Do you remember		22 Instagram -- sorry. If I could rephrase the	
23 that?		23 question.	
24 A. Yes, I do.		24 Can you -- can you describe what	
25 Q. If a restriction on an account is		25 platforms have that mechanism?	
	26		28
1 removed, what happens to previous comments		1 A. Facebook has that mechanism where	
2 made by the restricted account?		2 if -- if a user's comment is hidden, it can	
3 A. I believe they that are unrestricted		3 still be visible to the commentor and Facebook	
4 or -- or unhidden at that point.		4 friends of the commentor.	
5 Q. Okay. You said you believe that		5 Q. Is there any way for somebody without	
6 they're unhidden. Does that -- does that mean		6 a Facebook account to view university's social	
7 that you're not entirely sure what happened if		7 media posts on Facebook?	
8 a restriction on that account was removed?		8 A. I believe so, yes. I've tried that	
9 A. Yes. I'm unsure. I don't recall at		9 before when, like, not log into Facebook. You	
10 this specific point. There are a lot of		10 can still view the account and posts. But	
11 settings and -- yeah. And Instagram and		11 very quickly, Facebook will prompt you to sign	
12 Facebook change their settings from time to		12 in and act as an -- as, you know, a -- an	
13 time without account, you know, admins		13 account capacity.	
14 knowing.		14 Q. Is there any way for individuals	
15 So to the best that I can recall		15 without Instagram accounts to view posts and	
16 or -- yeah, I'm not sure.		16 comments from the university's social media	
17 Q. Okay. Now, I want to walk through		17 account?	
18 this sort of similar line of questions with		18 A. Yes. I believe in a similar fashion	
19 regards to Facebook.		19 to Facebook.	
20 Can you -- can you describe how		20 Q. There's also automatic moderation on	
21 Facebook moderation differs from Instagram		21 Instagram and Facebook; is that correct?	
22 moderation?		22 A. Yes.	
23 A. Yes. Facebook offers different		23 Q. Can you describe how automatic	
24 moderation tools, and some similar or		24 moderation works?	
25 identical ones.		25 A. Sure. So automatic moderation is a	

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1 tool offered through Facebook and Instagram 2 where -- sorry. 3 Where an account administrator can add 4 a word or phrase to a list within Facebook or 5 Instagram where if a commentor uses that word 6 or phrase in their comment, the comment will 7 automatically be hidden. 8 Q. And when a comment's been 9 automatically moderated and hidden on Facebook 10 or Instagram, that means no one can view it; 11 correct? 12 A. I believe the commentor can still see 13 their comment. 14 Q. Okay. Now, could people reply or 15 otherwise interact with hidden comments that 16 they can't view? 17 A. If on Facebook the hidden 18 comment -- let me rephrase that. 19 If -- if -- if an individual comments 20 on Facebook and includes a word or a phrase 21 within the list -- the auto-moderated list set 22 by the account administrator, that comment is 23 hidden. 24 However, I believe that both the 25 commentor and friends of the commentor can		1 You can share Facebook posts to your 2 account and have your -- your own comment 3 section, or users interact in various ways 4 by -- by -- with your -- a user's post based 5 on sharing that original post by the 6 university. 7 On Instagram, you can -- and when I 8 say "you," I mean a user. 9 On Instagram you can hit the share 10 button and you can share it. You can share 11 that post to your story. 12 And a story is typically a 13 24-hour -- it's -- it's a temporary post 14 that -- that's live for 24 hours to either the 15 public or, you know, a set of friends that the 16 user determines. 17 You can -- as a user, you can report a 18 Facebook or Instagram post. You can embed 19 Facebook and Instagram posts, say, you know, 20 off -- on a different website. 21 There might be more, but I'm -- I -- I 22 don't recall any others at this time. 23 Q. Okay. How would -- how would somebody 24 see -- excuse me. 25 How would a university social media	
1 still see that comment made by the original 2 commentor. 3 Q. And -- and on Instagram, even -- can 4 friends see that on -- excuse me. Let me 5 rephrase the question. 6 Can friends see restrictive comments 7 on Instagram? 8 A. I don't believe so. That's where 9 Facebook and Instagram differ with their 10 platform settings. 11 Q. And are there other ways that an 12 Instagram or Facebook user can interact with a 13 university social media account other than by 14 commenting on a post? 15 A. Yes. Many. 16 Q. What are -- can you list off the 17 different ways, other than commenting on a 18 post, that a -- Instagram or Facebook users 19 can interact with the university's social 20 media account? 21 A. Yeah. A user can like or react. So a 22 user can like an Instagram post or a user can 23 react. Because Facebook has different 24 reactions, you can like or love or use 25 different kind of emoticons set by Facebook.	30	1 post present itself to other people? 2 Actually, let me rephrase that question one 3 more time. 4 When the university makes a new social 5 media post, how -- how does that post get out 6 to other people? 7 A. Primarily, a Facebook or Instagram 8 post is delivered onto a user's news feed 9 based on if they -- if that user is following 10 the Facebook or Instagram account. 11 However, there's a thing called -- 12 like the Facebook and Instagram algorithm 13 where Facebook and Instagram ultimately 14 determine where and who they deliver 15 those -- those posts to. 16 They'll sometimes suggest a post by a 17 page to a user, even if they're not following. 18 And on the flip side, they -- Facebook or 19 Instagram might not display a post by an 20 account you're following in your news feed. 21 And that's just based on Facebook and 22 Instagram's algorithms. 23 Q. Does the -- does the university 24 ever -- ever pay to have their -- the social 25 media accounts suggested or advertised to	32

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1 people?		1 And I believe that campaign -- we ran	
2 A. In a limited capacity, yes. It's		2 that campaign January through June of 2021 to	
3 that -- but those are not managed by me or		3 the best that I can recall.	
4 anyone in university communications.		4 Q. And what kind of social media	
5 Q. Can you -- can you describe the		5 advertising did they do in that campaign that	
6 limited circumstances where the accounts are		6 you remember?	
7 advertised?		7 STENOGRAFHER: I'm sorry.	
8 A. Yeah. Those advertisements are		8 (Captured testimony read	
9 managed by university marketing, which is a		9 back.)	
10 sibling office to university communications.		10 BY MR. BERRY:	
11 But specialists within university marketing		11 Q. Sorry. That you remember.	
12 will run advertisements based on a certain		12 A. I don't recall -- or I can't recall	
13 campaign.		13 any specific ads that were run.	
14 We -- the university has had several		14 Q. Okay. With regards to the COVID	
15 campaigns in the past. The most recent one		15 campaign, did the advertisements include any	
16 being COVID-19 safety and public health		16 @UW-Madison posts?	
17 awareness.		17 A. Could you clarify that, please?	
18 But in a limited capacity, we don't		18 Q. With -- with regards to the COVID	
19 pay to boost organic posts. It -- but -- but		19 campaign where -- were any @UW-Madison social	
20 the university does advertise on -- on		20 media posts advertised or promoted in	
21 Facebook and Instagram based on a certain		21 connection with that campaign?	
22 campaign running that is determined by		22 A. If I understand your question	
23 university marketing.		23 correctly --	
24 Q. Other than COVID, what other campaigns		24 (Telephone ringing.)	
25 have been run in the past that you're aware		25 THE WITNESS: I'm sorry. I'm getting	
	34		36
1 of?		1 an incoming call on my office phone, but I	
2 A. We had a campaign called can't stop a		2 won't answer it.	
3 Badger. We've also had a campaign called		3 Okay. There we go. Sorry. Sorry for	
4 IMUW. And we also allow division of		4 the interruption.	
5 continuing studies to advertise for summer		5 So if I understand your question	
6 term and other division of continuing studies		6 correctly, a -- a social media has to have an	
7 campaigns.		7 account where the ad originates from.	
8 Q. With regards to the can't stop a		8 So, yes, there are advertisements	
9 Badger campaign, what time period did that		9 coming from @UW-Madison Facebook and Instagram	
10 campaign run?		10 from -- from those accounts.	
11 A. I don't know. I'm sorry. I really		11 BY MR. BERRY:	
12 only deal with the organic side. Organic		12 Q. With -- going back to the can't stop a	
13 meaning not adver- -- not paid advertisement.		13 Badger campaign, what was -- what was that	
14 It -- it happens on a different side of		14 campaign about, to the best of your knowledge?	
15 Facebook or Instagram that I -- I don't		15 A. Yeah. That campaign kind	
16 monitor regularly.		16 of -- they -- it featured kind of various	
17 Q. So can you even give, just your best		17 aspects of the university center, and it was	
18 guess, with the caveat that you don't know		18 kind of like a statewide outreach campaign.	
19 this, that the dates that it ran very -- very		19 So targeted at in-state residents.	
20 well?		20 And I believe that was for the	
21 A. Sure. Well, we had an		21 legislative cycle at that time to, you know,	
22 organic -- well, the campaign exists outside		22 raise awareness and promote various aspects of	
23 of social media advertisements. If, in fact,		23 the university that were deemed important by	
24 they do run social advertisements for can't		24 folks in university marketing and elsewhere.	
25 stop a Badger.		25 Q. And you say for -- this was during the	

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	37		39
1 legislative cycle that this campaign ran for 2 can't stop a Badger?		1 option to like -- well, tag -- tag a user 2 within the image itself so that if you tap the 3 image, you can see tags pop up of one or, I 4 think up to 25 accounts.	
3 A. That I'm aware of, yes. 4 Q. Yeah. And that would be for 5 presumably just for university funding and 6 reputation?		5 And you can also tag university in an 6 Instagram story, either with a sticker -- the 7 at mention sticker or by, you know, plain 8 text, writing out at -- at UW-Madison or any 9 account within text that you insert into your 10 Instagram story.	
7 Would that be a fair characterization? 8 Or sorry, let me rephrase the question. 9 Why would -- why would the legislative 10 cycle be relevant to the campaign as far as 11 you know?		11 Q. If somebody tags the university, does 12 that -- does that -- will -- will the post 13 where they've tagged the university appear 14 anywhere on the university's social media 15 account or feed?	
12 A. Yeah. I think for, you know, public 13 perception and ultimately, funding or for, you 14 know, the passage of certain bills or pieces 15 of legislator that were up for debate. 16 Q. And moving to the IamUW campaign, 17 what -- what was that campaign about?		16 A. I'm sorry. Sorry. Could you repeat 17 the question? 18 Q. Sure. Let me put it this way: 19 What -- what does the university see when 20 somebody tags it on a Facebook or Instagram 21 post?	
18 A. That campaign was apparently 19 about -- it's -- it's a diversity equity and 20 inclusion initiative geared towards current 21 students to build community around personal 22 identities, you know, ethnicity, race, 23 culture, and -- and other forms of identity to 24 build community within the current student 25 body.		22 A. I -- sorry. I interpreted your 23 clarification question differently than your 24 original question. 25 Q. That's okay. I think the	
	38		40
1 Q. And what, to the best of your 2 knowledge, what dates did that campaign run? 3 A. We were still having in-person 4 meetings, so it was prior to the pandemic, 5 maybe as far back as 2018 or 2019 up to, I 6 would say maybe May 2020. But 7 that's -- that's my best guess. 8 Q. Can you describe the ability to tag 9 the university on Instagram and Facebook? 10 A. Sure. Could you clarify "tag" 11 as -- as the university itself, as a user? 12 What do you mean by that? 13 Q. Yeah. Are -- are users able to tag 14 the university's social media account in their 15 own Facebook and Instagram posts?		1 clarification question is a more clear one. 2 So, yeah, just -- yeah, what does the -- we 3 can scrap all that. 4 Just what does the university see when 5 someone tags it in a Facebook or Instagram 6 post? 7 A. Well, I wouldn't say "see," because 8 that's dependent on the admin's -- you know, 9 if -- if they see. 10 But Facebook and Instagram will 11 deliver notifications to the admin level -- or 12 to -- to account administrators that a user 13 tagged the university in a post or video. 14 Or if that -- what I mentioned earlier 15 about a user tagging within the Instagram 16 photo or video itself, there is a separate tab 17 on the university's Instagram account where 18 you can view tagged photos and videos where 19 that -- that user's content -- not the 20 university's content, but the user's content 21 is visible so far as the user who performed 22 the tag has a public account. 23 Q. And is there -- does Facebook have a 24 similar way to view tagged posts from the 25 university's page?	
16 A. Yes. They work a little differently 17 on -- on each platform. But, you know, if I 18 were a user and, you know, I'm -- I'm posting 19 a photo of my mug of coffee, it has Bucky 20 Badger on it, say, I could write a caption and 21 at mention tag the university or the 22 @UW-Madison. And -- and same with Facebook, 23 you can, you know, at mention and tag 24 UW-Madison in your post. 25 And on Instagram, there's also the			

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	41		43
1 A. Facebook functions vary differently in 2 that regard. It's much larger than 3 Instagram's platform or functionality within a 4 page.		1 media accounts; is that -- is that correct?	
5 I don't believe that -- and there 6 are -- you know, different privacy barriers 7 within Facebook. So I don't believe that 8 other users can see tagged -- can see posts by 9 other users that have tagged the university.		2 A. Yes.	
10 Q. Okay. So just talking about 11 Instagram, then, are there ways to moderate a 12 tag when the university has been tagged in 13 somebody else's post?		3 Q. So from the time period before the 4 lawsuit was filed, can you describe how 5 decisions for moderating comments were made 6 within your department?	
14 A. Yes. The university can report the 15 post by the user. The university can untag 16 itself in -- in the user's post. The 17 university can just hide that -- that user's 18 post from appearing on the tagged tab on the 19 university's account.		7 A. Sure. You know, it's a -- really a 8 case-by-case basis. You know, it can't -- but 9 in general, we have a social media statement 10 on our website that kind of, I would say, 11 provides a guide for how we manage comment 12 moderation as social media managers.	
20 Q. Okay. With regards to my client 21 Ms. Krasno, you -- you've moderated comments 22 made by Ms. Krasno on the university's 23 Facebook page; is that correct?		13 Q. And when -- how long has this social 14 media guide as you call it, how long has that 15 social media guide been on the university's 16 Web page?	
24 A. That's correct.		17 MR. KILPATRICK: Objection. The 18 witness called it a social media statement.	
25 Q. And have you restricted her account on		19 MR. BERRY: Statement, okay. Yeah. 20 BY MR. BERRY:	
1 the university Instagram page?	42	21 Q. How long has that social media 22 statement been on the website?	
2 A. That's correct for a -- a specific 3 period of time.		23 A. For as long as I can remember. 24 It -- it was -- it had been established on the 25 website when I started in July of 2013.	
4 Q. And have you moderated comments by her 5 on the university's Instagram account?		26 Q. Is it -- has the social media 27 statement changed during your course of 28 employment as a social media manager?	
6 A. Yes.		29 A. Not that I know of, no.	
7 Q. And were those moderations of 8 Ms. Krasno done within the scope of your 9 duties as a social media manager for the 10 university?		30 Q. Okay. And let's see.	
11 A. Yes.		31 Other than the social media statement, 32 were -- were there -- were there any -- any 33 other guidance from the university that 34 affected your moderating management?	
12 Q. And did you perform those actions 13 using a work computer?		35 A. Yeah. The office of legal affairs 36 provided some interim guidance in the spring 37 of 2021.	
14 A. Yes, I did.		38 Q. And interim guidance in the spring 39 of 2021, was that before or after this lawsuit 40 was filed?	
15 Q. And when you performed those 16 moderation activities with regards to 17 Ms. Krasno, were you being paid by the 18 university for your job as a social media 19 specialist?		41 A. I believe it was after.	
20 A. Yes, I was.		42 Q. Okay. So this -- other than the 43 social media statement on the website before 44 the lawsuit was filed, can you describe how 45 decisions for moderating comments were made?	
21 Q. Okay. So earlier you said that is a 22 part of your position, that you -- you're the 23 primary person responsible for moderating and 24 at times you supervise and guide others at the 25 university about moderating on the social		46 Let me rephrase that question, actually.	
		47 Can you describe how the social media 48 statement related to your decisions for 49 moderating comments on social media?	
		50 A. Yeah. I would call the social media	

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1 statement as, you know, our reference guide		1 Q. What's the -- in what ways do	
2 for what types of comments to moderate, if		2 the -- do the social media guidelines differ	
3 needed.		3 from the social media statement, if at all?	
4 Q. And what types of comments does		4 A. So the -- they -- they list -- the	
5 it -- what types of comments do you moderate		5 social media guidelines on the university	
6 based on that social media statement?		6 relations website go into much greater depth	
7 A. Yeah. The statement lists, you know,		7 about social media management as an employee	
8 several criteria. If a comment is profane,		8 of the university, as well as representing	
9 obscene, off topic, a commercial or just		9 yourself in your personal capacity.	
10 outside promotion not affiliated with the		10 And they're more about account	
11 university, injurious or illegal. There might		11 management and -- and, you know, functioning	
12 be other criteria, but I can't recall at this		12 as university employees within the social	
13 time.		13 media space.	
14 Q. Okay. Actually, I want to mark as		14 Q. Okay. So the -- so the social media	
15 Exhibit 20 the UW0150.		15 guidelines are -- are about posting in the	
16 MR. BERRY: Can we get that marked and		16 circumstances where -- where you represent or	
17 shared up on the screen? This is the social		17 might be considered to represent the	
18 media statement Web page.		18 university; is that -- is that a fair	
19 (Whereupon, Moll Deposition		19 characterization?	
20 Exhibit No. 20 was marked		20 A. Generally, yes.	
21 for identification.)		21 Q. And then is there any guidance on the	
22 MR. BERRY: All right. Thanks.		22 social media guidelines on the relations page	
23 BY MR. BERRY:		23 with regards to moderation of social media	
24 Q. Do you -- do you see the -- what's		24 comments?	
25 marked as Exhibit 20, Mr. Moll?		25 A. I believe it's briefly mentioned.	
	46		48
1 A. Yes, I do.		1 Q. Do you remember what it says about	
2 Q. Are you familiar with this document?		2 moderation or those guidelines?	
3 A. I am.		3 A. I don't recall what it says, no.	
4 Q. And what is it?		4 Q. Okay. Going back to Exhibit 20, the	
5 A. This is a social media statement.		5 social media statement that's in front of us,	
6 Q. And I understand this document is the		6 what -- can you -- can you explain your	
7 university's currently operative social media		7 understanding what this policy says about	
8 statement. Would you agree with that		8 off-topic comments?	
9 characterization?		9 A. Sure. Well, I do want to clarify,	
10 A. Yes.		10 this isn't a policy. It's a social media	
11 Q. And earlier you said this -- to the		11 statement.	
12 best of your knowledge, it's the -- this is		12 Q. Is there -- is there any policy, to	
13 the language that's been in effect since you		14 your knowledge, that you've been aware of	
14 started in 2013; is that right?		15 that's impacted your moderating decisions as	
15 A. To the best of my knowledge, yes.		15 the social media manager?	
16 Q. This -- are you aware of any other		16 A. No. We haven't had a policy, and	
17 publicly available guidance about social media		17 currently do not.	
18 moderation for the university, other than this		18 Q. So that's -- so let me rephrase my	
19 statement?		19 question, then.	
20 A. There is also a set of social media		20 Does this statement, marked as	
21 guidelines posted on the university relations		21 Exhibit 20 here, what does this statement say	
22 website that's available to the public.		22 with regards to moderating or posting	
23 Q. And what department did you say the		23 off-topic comments to the university social	
24 social media guidelines were on?		24 media sites?	
25 A. University relations.		25 A. Yeah. The statement lists off topic	

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1 as one of the criteria where the university 2 shall have the right to remove 3 any -- that -- the content that includes the 4 criteria being off topic, but not limited to 5 being off topic.		1 (Captured testimony read 2 back.)	
6 Q. Is there a -- what's your 7 understanding of when a comment is off topic 8 under this social media statement?		3 THE WITNESS: Oh, produced by office 4 of legal affairs.	
9 A. Under this social media statement I 10 would determine a comment to be off topic that 11 generally doesn't cover the topic of a 12 specific social media post made by the 13 university.		5 STENOGRAPHER: Thank you.	
14 Q. And is there any definition for how to 15 determine when something is off topic, either 16 on a statement or anywhere else within the 17 university?		6 BY MR. BERRY:	
18 A. Office of legal -- excuse me.		7 Q. Does this guidance change how you 8 moderated comments?	
19 Office of legal affairs did produce 20 some interim guidance, particularly as it 21 relates to the criteria of being off topic and 22 provided further clarification within that 23 interim guidance.		9 A. In regards to the criteria listed in 10 the social media statement, and the criteria 11 being off topic, yeah, this provided further 12 guidance, how to determine whether a specific 13 comment was -- or content is on or off topic.	
24 MR. BERRY: All right. Can we 25 actually introduce as Exhibit 21 the -- what		14 Q. Okay. Did it -- did it change your 15 own view of what an off-topic comment was?	
	50	16 A. Yeah. It -- it provided -- it 17 educated me more on -- on how to determine 18 whether a comment fit the criteria of being 19 off topic or not.	
1 would be marked as the UW0076 file? 2 And this is an email entitled "Interim 3 Social Media Moderation Guidance." 4 (Whereupon, Moll Deposition 5 Exhibit No. 21 was marked 6 for identification.)		20 Q. Okay. And how -- how -- how did 21 it -- how did it change your view or inform 22 your view further on what an off-topic post 23 is?	
7 BY MR. BERRY: 8 Q. All right. Mr. Moll, do you see -- do 9 you see as Exhibit 21 in front of you?		24 A. I -- I think it helped -- it helped me 25 understand, you know, the -- like the middle	
10 A. I see an email. I don't see it 11 labeled as Exhibit 21. 12 Oh, there it is. Yes. 13 Q. And are you familiar with this 14 document?			52
15 A. Could you scroll up to the top again, 16 please? 17 Yes. I am familiar with this 18 document. 19 Q. And what is it?		1 ground. You know, sometimes it -- it's a 2 human decision, you know, in all these cases. 3 I should -- well, so the -- under the 4 section content moderation, on topic versus 5 off topic, the -- that guidance helps clarify 6 situations where a comment may be on topic, 7 even if it also includes off-topic content or 8 vice versa.	
20 A. This is the interim social media 21 guidance -- [indiscernible] -- legal affairs. 22 STENOGRAPHER: I'm sorry. 23 THE WITNESS: I'm sorry. 24 STENOGRAPHER: I didn't catch what you 25 said.		9 Q. Okay. At the very first sentence of 10 Exhibit 21 here, this interim social media 11 guidance, says that [as read]: 12 "The social media managers 13 may engage in content 14 moderation on social media 15 pages based on one 16 criteria whether posted 17 content is on or off 18 topic." 19 Do you understand that as requiring 20 you to -- to remove anything that's off topic 21 or just that, that you're able to, if you 22 want? 23 A. It says "may engage." So it's -- it 24 doesn't require any social media manager to do 25 so.	

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1 Q. Yeah. How do you -- how do you 2 determine whether to -- whether to remove 3 something that's off topic or not? 4 A. Sorry. Could you clarify what you 5 mean by "remove"?		1 it can be hidden or deleted, replied to or 2 reported. 3 Q. How do you decide whether to hide, 4 remove, report or reply to an off-topic 5 comment? 6 A. It -- it depends on the social media 7 platform. There are different functions 8 within Facebook and Instagram as we described 9 earlier.	
6 Q. Sorry. Yeah. As we -- well, as we 7 stated earlier, there are a number of ways to 8 moderate a comment. Do you remember that 9 conversation? 10 A. Yes.		10 Q. How do you -- how do you -- among the 11 different options, do you -- do you 12 consistently use one over the others when 13 you're deciding how to moderate an off-topic 14 comment? 15 A. I -- I -- to the best of my ability, 16 yes. But as -- as social media platforms 17 evolve, you know, Facebook and Instagram 18 introduce different tools available to account 19 managers.	
11 Q. So my question is: How do you decide 12 whether to exercise any of your moderation 13 powers with regard to an off-topic comment? 14 A. Social -- or comment -- as a social 15 media manager, one of the -- you know, duties 16 of my role is -- is to review comments that 17 are made on UW-Madison social media posts. 18 And so as per that job -- you know, 19 part of my job I would consider comment 20 moderation determining, you know, if -- if 21 comments meet the criteria listed in the 22 social media statement.		20 And -- and so as social media 21 platforms evolve, so must the social media 22 manager or we have -- I have the ability to, 23 based on the tools provided.	
23 Q. Do you always remove off-topic 24 comments? 25 A. Not always, but to the best of my		24 Q. Right. How do you choose what tool to 25 use?	
	54		56
1 abilities, I try to, you know, abide and 2 remain consistent with those criteria listed 3 in the social media statement. 4 But social media posts are living 5 documents. And so users can comment or remove 6 their comments or perform any action available 7 to a user at any time. And so I might not 8 always see every comment. 9 Q. Okay. Then you're saying -- well, 10 you're testifying that you try to 11 remove -- and let me know if I'm 12 characterizing this correctly -- that you try 13 to remove all off-topic -- off-topic comments 14 to the best of your ability? 15 A. With the understanding that "remove" 16 means any -- any form of moderation as we've 17 described earlier, yes. 18 Q. So it's -- so to put that more 19 clearly, it's your testimony that you try to 20 moderate off-topic comments to the best of 21 your ability all the time? 22 A. To the best of my ability, yes. 23 Q. All right. And in what ways do you 24 moderate off-topic comments? 25 A. If an off-topic comment is moderated,		1 How do you choose what the optimal 2 tool is for any given off-topic comment? 3 A. It really depends on the situation, 4 whether it's -- you know, if we're talking 5 about a -- an individual off-topic comment, 6 then on -- Facebook, you know, could hide it. 7 But on Instagram, which doesn't have a 8 hide feature for individual comments, if it's 9 deemed to be off topic, then we'd likely 10 delete it. 11 MR. BERRY: We -- let's -- I know we 12 have been doing this for like an hour and a 13 half. Should we just take like a ten-minute 14 break? And then we can split up the morning 15 in half that way before lunch. 16 MR. KILPATRICK: That sounds good to 17 me. 18 MR. BERRY: Okay. 19 VIDEOGRAPHER: I'll bring us off the 20 record. 21 The time is 11:33. We're going off 22 the record at the end of recording 1. 23 (A short recess was had.) 24 VIDEOGRAPHER: The time is 11:45. 25 We're on the record at the start of recording	

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	57		59
1 2.		1 And so, you know, as -- as I've, you	
2 MR. BERRY: All right. Welcome back.		2 know, grown, and as I've grown in, in this job	
3 Could we get Exhibit 21 back on -- on		3 position, I have taken on more responsibility	
4 the screen?		4 and also delegated when -- when needed or --	
5 BY MR. BERRY:		5 or when applicable.	
6 Q. Okay. Mr. Moll, earlier we were --		6 Q. So you're saying that -- that you've	
7 previously we were talking about wh- --		7 always tried to consistently remove all	
8 deciding when to remove off-topic comments.		8 off-topic comments to the best of your	
9 And looking back on -- to Exhibit 21		9 ability?	
10 here where it says [as read]:		10 Is that a fair characterization of	
11 "Social media managers may		11 what you're testifying?	
12 engage in content		12 A. To the best of my ability, yes.	
13 moderation for off-topic		13 MR. BERRY: Can we go back to	
14 comments."		14 Exhibit 20?	
15 What -- what -- why did you decide to		15 BY MR. BERRY:	
16 try to remove all off-topic comments to the		16 Q. In Exhibit 20 you also see here	
17 best of your ability, even though this interim		17 that -- I'm sorry.	
18 guidance authorizes you to moderate comments,		18 With regards to the social media	
19 but not require you to do so.		19 statement at Exhibit 20, do you -- do you	
20 I could -- you know, actually, let me		20 understand this social media statement	
21 just rephrase that.		21 as -- as requiring you to remove off-topic	
22 Would -- would you agree that this --		22 comments?	
23 that this interim social media moderation		23 A. No.	
24 guidance authorizes you, but doesn't require		24 Q. And -- and why don't you think you're	
25 you to moderate off-topic comments?		25 required to under the statement?	
	58		60
1 A. Yes, I would agree with that.		1 A. Under the statement it says that [as	
2 Q. And earlier you testified that -- that		2 read]:	
3 you tried to remove all off-topic comments to		3 "UW-Madison shall have the	
4 the best of your ability; correct?		4 right to remove any	
5 A. Correct.		5 content for any reason,	
6 Q. So -- so why do you try to remove all		6 including, but not limited	
7 comments that are off topic when you're not		7 to, the criteria listed."	
8 required to do so under this guidance?		8 There's -- it does not say there is a	
9 A. I would say to be consistent as the		9 requirement. But as understood, and in --	
10 best that I can. Granted, social media posts		10 as -- in my role as a social media manager,	
11 are living documents. So, you know, I -- I		11 that is part of my role to perform as -- you	
12 don't -- you know, I might not see every		12 know, all aspects of -- of account management.	
13 single comment. But to the best of my		13 And part of account management is content	
14 ability, I try to be consistent and, you know,		14 moderation.	
15 provide equal treatment when possible.		15 Q. And the reasons that says -- the	
16 Q. Have you always tried to remove all		16 reasons that are included, but not limited to	
17 off-topic comments to the best of your ability		17 under social media statement for moderation	
18 since you started this role in -- in 2014, or		18 are content that it deems -- that the	
19 was there a point when you changed		19 university deems to be threatening, profane,	
20 your -- your behavior or philosophy?		20 obscene, violation of intellectual property	
21 A. My behavior or philosophy hasn't		21 rights or privacy laws, off-topic, commercial,	
22 changed. My philosophy hasn't changed. You		22 or promotion of organizations or programs not	
23 know, granted I've been in this role for more		23 related to or affiliated with the university	
24 than eight years. You know, I -- I'm not the		24 or otherwise injurious or legal.	
25 only one with access to the accounts.		25 Is that a fair characterization?	

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1 A. Yes, it is.		1 statement, did your -- did your job training	
2 Q. But the social media statement says		2 include any other discussions about social	
3 that it can remove content for any reason,		3 media?	
4 including, but not limited to, those reasons I		4 A. Yes, it did. Primarily covering	
5 just listed; correct?		5 content creation and just familiarizing myself	
6 A. Correct. It says that.		6 with -- with the platforms that develop with	
7 Q. Are there any other reasons, other		7 the accounts that had already been created.	
8 than the ones listed, that you remove -- or		8 Q. Was there anything else with regards	
9 excuse me.		9 to moderation, besides this social media	
10 That you moderate comments for?		10 statement when -- when you were training for	
11 A. At -- there might be at -- but it -- I		11 your job?	
12 tried to stick to the criteria within the		12 A. Not that I can recall.	
13 statement. But it is possible that, you know,		13 Q. And then subsequently to being	
14 they have removed or hidden or -- or performed		14 onboarded for your current position,	
15 a moderation for other reasons, but it's a		15 where -- were there any other trainings	
16 case-by-case basis.		16 relating to social media moderation that	
17 Q. With regards to the social media		17 you've undergone?	
18 statement, have you -- did you ever undergo		18 A. Excuse me. In regards specifically to	
19 any sort of training for this social media		19 social media moderation, I don't believe so.	
20 statement at any -- at any time in your		20 But I've attended, you know, conferences, and	
21 position as a social media manager?		21 seminars, and groups focused on social media	
22 A. Training specific to this social media		22 throughout my employment as -- as part of my	
23 statement in particular?		23 employment, and -- and role in this job on	
24 Q. Yes.		24 many different aspects of social media.	
25 A. I mean, when I -- when I started the		25 But I don't recall -- or I'm not aware	
	62		64
1 job and -- and, you know, was brought on		1 of any that are specifically about content	
2 board, I was introduced to the statement and		2 moderation.	
3 the university relations, social media		3 Q. Okay. Have you ever had any -- any	
4 guidelines. And we, you know, we had a		4 discussions with anyone at the university	
5 discussion about them. And -- so as part of		5 about how much discretion you have in deciding	
6 my job onboarding, you know, the social media		6 whether to restrict or moderate a comment on	
7 statement was -- was covered in that, I		7 the university's social media pages?	
8 believe.		8 A. Yes, I have.	
9 Q. Do you remember -- can you describe		9 Q. Can you describe those discussions	
10 what was -- what you were instructed about or		10 with regards to who they were with?	
11 trained on with regards to the social media		11 A. Yeah. Well, in my role I am	
12 statement?		12 the -- it's not an official title, but I	
13 A. I -- I can't recall specifics about		13 would, you know, position myself as one of, if	
14 it. There was a lot of content covered. So,		14 not the, lead social communicator on campus.	
15 no, no, I can't recall.		15 And so employees look to me for	
16 Q. Okay. And did the -- did your job		16 guidance. And -- and we have many, many	
17 onboarding and training include any -- any		17 employees who manage social media accounts.	
18 other instruction with regards to -- to social		18 And so I just -- I've had many different	
19 media, other than the social media statement		19 conversations.	
20 or guidance?		20 Typically speaking, we'll get	
21 A. Any other training at all did you ask?		21 questions, you know, relating to a specific	
22 Sorry.		22 user or a specific comment. But, yeah,	
23 Q. Correct. Yeah. Was there -- other		23 it -- it's a case-by-case basis.	
24 than the social media guidelines on the		24 Q. So it sounds like your -- you're	
25 university relations page or this social media		25 saying that you're often the one people are	

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1 going to ask for advice about moderation?		1 where other university communications staff	
2 A. Not always. But in my role, yes. I		2 would be considered the social media lead for	
3 do have, you know, many communicators who do		3 the day, where they would be the ones -- or	
4 come to me.		4 they would be the one kind of on point or in	
5 Q. And what sorts of -- what kinds of		5 charge of outbound content for the day,	
6 issues do people come to you with?		6 editorial content.	
7 A. A lot of different issues. Whether		7 Where -- because just dealing with the	
8 it's, you know, a functionality of, you know,		8 COVID, and, you know, just ongoing emergency	
9 I don't understand this new feature or how do		9 situation, I had many other aspects of my job	
10 I get more followers or, you know, optimizing		10 to do, but didn't have the time or bandwidth	
11 social media posts for, like the Web or -- or		11 for it. Excuse me.	
12 for viewers, you know, when you're -- you		12 And so there would be -- there would	
13 know, when you're drafting a social media		13 be times where I would check in. You know,	
14 post, how it looks to the -- the public side		14 usually around the end of the day and see, you	
15 of it as opposed to in draft form, and, you		15 know, if there were any issues. You know, I	
16 know, how visuals can -- can play into that.		16 can -- I can think of one specific one where I	
17 And like I said on, you know, specific		17 asked my colleague, Nick, you know, we	
18 comments or users for campaigns, I also		18 were -- we were going through a -- what I	
19 produce many graphics. And -- and so I have		19 would just colloquially consider, like a spam	
20 folks coming to me asking to, you know, help		20 campaign.	
21 give their -- give their campaign a boost,		21 And I asked him, since Nick was	
22 particularly as it related to COVID-19 and		22 serving as a social media lead for the day,	
23 public health awareness as a recent example.		23 and I hadn't had my eyes on social for most of	
24 Many, many different topics people come to me		24 the day, you know, if there were any, you	
25 with.		25 know, words or phrases that kept -- were --	
	66		68
1 Q. And do you ever go -- do you ever ask		1 were being repeated that, you know,	
2 other people for guidance on moderating social		2 might -- we might consider to add to our	
3 media posts at the university?		3 auto-moderated list of words or phrases.	
4 A. If I have questions about specifics		4 Q. Okay. What was the -- do you remember	
5 I -- you know, probably contact legal.		5 what the spam campaign was about?	
6 Q. Is there anyone, other than legal, who		6 A. No. I would need to see the	
7 you would contact about -- about specific		7 conversation in front of me.	
8 moderation situations?		8 Q. All right. Is spam -- how does spam	
9 A. I might go to other social media		9 fit into your social media moderation	
10 managers, you know, who manage -- who also		10 decision-making?	
11 help manage the UW-Madison accounts or, you		11 A. Yeah. I would say that more often	
12 know, other -- other staff members within		12 than not I would consider spam to be off	
13 university communications, colleagues, who		13 topic.	
14 might be a subject matter expert in the		14 But in terms of what spam is, it's --	
15 particular, like, particular area where I have		15 it's usually directed by an outside source to,	
16 a question or that -- that can go for other		16 you know, go and comment on UW-Madison's	
17 university staff as well.		17 social media accounts with a, you know,	
18 Q. Can you give an example of a time		18 specific phrase or -- or whatever, and	
19 where you sought out a colleague and -- and		19 basically just jam up our comment sections,	
20 asked about a social media moderation		20 and, you know, where users will just pile on.	
21 situation?		21 And it becomes quite overwhelming as a social	
22 A. Yeah. I know they're out there.		22 media manager.	
23 Sorry. I'm trying to think of one specific		23 Q. What's overwhelming about reading	
24 one.		24 several comments on your posts?	
25 There would -- there would be times		25 A. It -- it can be overwhelming where	

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1 you're receiving hundreds, if not thousands of 2 comments unrelated to the social media post at 3 hand when, for instance, if the -- the 4 comment -- or the -- sorry, the social media 5 post by UW-Madison is about, you know, current 6 public health guidance, and, you know, 7 student -- and were there -- you know, and 8 students might have questions that they're 9 looking to get answered. And it's sometimes 10 quite overwhelming to try and sift through all 11 of the spam or off-topic comments to try and 12 actually reach students who are trying to 13 engage in the specific social media post. 14 They're there to respond to the topic that 15 we're discussing in that social media post.		1 not possible to do -- reasonably possible to 2 do by manual moderation, I'll look for a 3 keyword or phrase that, you know, consistent 4 -- it's consistently used in those comments. 5 And I'll add it to the auto moderated list. 6 It's -- you know, that's -- that's I 7 think -- I believe why the tool is there, to 8 help with situations like that.	
16 And there are times where I -- you 17 know, I -- I missed questions because we were 18 completely inundated by -- by spam commentors.		9 Q. And when you put a word on the auto 10 moderated list, is there -- is there any sort 11 of practice with regards to removing those 12 words off the list at a future date?	
19 Q. You said sometimes there would be 20 hundreds of comments?		13 A. Yeah. Words or phrases can come and 14 go. Some -- it really just depends on -- on 15 the -- the situation.	
21 A. Yes.		16 I might -- I might review the list of 17 words or phrases every few months. Or if, you 18 know, if I'm adding a new word or phrase, I 19 might look at the list and deem that oh, like, 20 you know, I'm -- that -- like that word or 21 phrase on the list, you know, might not really 22 be applicable to need auto moderated level 23 status.	
22 Q. Okay. And how would you -- how do 23 you -- how do you handle those -- those 24 situations where you're receiving a lot of 25 comments that you -- that you consider to be		24 And so I might remove it at that 25 point. But I don't -- I don't have a calendar	
	70		72
1 off topic on a post? 2 How do you moderate those? 3 How do you moderate those comments? 4 A. It depends on the situation. But -- 5 and -- and it also depends on which platform 6 we're talking about, just because the 7 functionality of managing comments differs by 8 the platforms from an admin perspective. 9 But if, you know, if we are 10 receiving -- if we're in the middle of 11 a -- a -- you know, a spam campaign, I'll go 12 in and, you know, just assess the situation 13 and try to look for the source, you know, 14 where -- where is this directive coming from, 15 and just to try to better understand, you 16 know, the -- the motivation behind it or just, 17 you know, just the situation. 18 And then from there, if I can manually 19 moderate, depending on the level of -- of, you 20 know, look -- or the amount of comments 21 received, I -- or I might go in or 22 might -- you know, direct someone on -- on 23 staff to help me with manual moderation, 24 looking for off-topic comments. 25 Or otherwise if -- if it's -- if it's		1 appointment or a timer to remind me to review. 2 It's just on an as-needed basis. 3 Q. What -- to the best of your ability, 4 can you recall any -- any and all words or 5 phrases that you had -- that you remember 6 removing from the auto-moderator, blocked-word 7 list? 8 A. The lists differ by Facebook and 9 Instagram. I -- I can't recall a specific 10 word or phrase. 11 Q. Okay. Do you -- I mean, how -- how 12 many times have you removed a word from 13 the -- from the list of auto moderated words? 14 A. I don't keep a count. 15 Q. If -- if you had to guess, would you 16 say it's been, you know, less than ten times 17 or more than ten times that you've removed a 18 word from the auto moderator? 19 A. Within -- within my time in this role, 20 probably more than ten times. 21 Q. Okay. Would you -- probably more than 22 ten times. So you're not -- you're not sure 23 if it's been more -- 24 A. I don't --	
		25 (Indiscernible simultaneous	

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1 colloquy.)		1 A. I can't recall the specific contents	
2 BY MR. BERRY:		2 of -- of the comment itself. But there are	
3 Q. -- or less --		3 certain instances where on Facebook I'll see	
4 A. I don't keep account. And the only		4 that a comment is hidden and I'll expand it	
5 record of -- of the words or phrases are		5 open. And it's just someone, you know,	
6 within the list itself on the -- on Facebook		6 tagging -- tagging their friend's name in the	
7 or Instagram.		7 comment. You know, and that's a common	
8 I don't keep a separate list in like a		8 practice to, you know, try to get the	
9 Word doc or anything like that. So I -- I		9 attention of that friend to see the -- the	
10 would -- I would guess more than ten times,		10 Facebook post.	
11 but I -- I don't keep a record.		11 And, I mean, we don't have specific,	
12 Q. And excuse me.		12 you know, names of regular people in our auto	
13 And how often -- excuse me.		13 moderated list. So I'm not sure why Facebook	
14 Do you have any practice -- let me		14 hid that comment. And so I'll go and, you	
15 rephrase that.		15 know, usually unhide it. Yeah.	
16 Is there a -- is there a way to let a		16 Q. Do you have any other examples or	
17 comment through to appear on a post even if it		17 instances where you -- where you unhid an auto	
18 has an auto moderated word in the post?		18 moderated comment on Facebook?	
19 A. On Facebook, yes. On Facebook		19 A. A -- I can't think of a specific	
20 it -- it allows you to, you know, view -- as		20 comment at a specific moment in time. But it	
21 an admin, you can view all the comments. And		21 is -- it is something that the act of	
22 it will -- if -- if there is a comment hidden,		22 reviewing is something that I do.	
23 you can view the hidden comment and determine		23 Q. And on Instagram, there's no way to	
24 to take an action from that, whether that be		24 unhide -- [indiscernible] -- comment; is that	
25 to allow the -- to unhide the comment, to keep		25 right?	
	74		76
1 it hidden, to delete the comment, to report		1 STENOGRAPHER: I'm sorry.	
2 the comment.		2 (Captured testimony read	
3 Q. Do you have any practice on Facebook		3 back.)	
4 of unhiding comments that fell within the auto		4 MR. BERRY: An auto-moderated comment.	
5 moderation, but which might happen to be on		5 BY MR. BERRY:	
6 topic, despite being filtered out?		6 Q. Is that correct?	
7 A. Yeah. We regularly review hidden		7 A. That's not correct.	
8 comments, or we regular -- regularly review		8 Q. Okay. Can you describe how to -- how	
9 comment sections. And if there is a hidden		9 to unhide a moderated comment on Instagram?	
10 comment, you know, I -- if I -- if I see that		10 A. In order to do -- in order to -- well,	
11 there's a hidden comment. Because sometimes		11 there are certain circumstances. So if	
12 there are a lot of relevant comments		12 the -- if an account level restriction has	
13 that -- you know, I just -- so I do try to		13 been placed on a user, then -- sorry. I lost	
14 look at hidden comments to the best of my		14 my train of thought.	
15 ability and determine, you know, is the auto		15 For account level restrictions, if a	
16 moderator working as I intended it to.		16 user were to comment and it is visible to that	
17 And if I do see that a comment that		17 user and the account administrator, wherein	
18 has been hidden is on topic as determined		18 the account administrator then has the option	
19 by -- or as is further clarified by the		19 to leave it hidden, approve it and unhide it,	
20 interim guidance, then I'll -- I'll go in and		20 delete it, report it, those options.	
21 unhide it.		21 As for hidden -- as for hidden	
22 Q. Can you provide a specific example of		22 comments by the auto moderator, to unhide a	
23 a time that you unhid a Facebook comment		23 comment you would need to remove that specific	
24 that -- that had been improperly auto		24 word or phrase from the auto moderated list.	
25 moderated?		25 Q. Okay. All right. Thanks.	

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1 And you said that you -- that -- you
 2 mentioned that you review -- that you watch
 3 the social media comments to decide what to
 4 moderate or perhaps un- -- unmoderate. Is it
 5 that -- that's correct?

6 **A. Yes.**

7 Q. Can you just walk me through sort of a
 8 typical day in -- you know, how -- how closely
 9 you're watching this and...

10 **A. How closely I'm watching what?**

11 Q. Sorry. Walk me through a typical day
 12 and just -- and just describe your -- your
 13 process of monitoring comments with regards to
 14 moderation?

15 **A. Sure. It -- a typical day I usually**
16 first meet with my supervisor, Mike, and we go
17 through the content for the day. And so
18 that's where I kind of go into the planning
19 phase of, you know, just what -- what outbound
20 content will feature on our accounts that
21 given day.

22 And then, you know, I'm checking
 23 emails, you know, working with UW social
 24 media, communicators as needed.

25 **But as it -- as -- you know, as we**

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1 **evening, before bed.**
 2 **But that's also in addition to**
3 performing a lot of other duties in my role.

4 Q. If -- if somebody posts a comment that
 5 that -- that's been auto moderated because it
 6 has a blocked keyword or blocked word, do
 7 you -- would you get a notification for that
 8 comment when it's made?

9 **A. The -- yeah. We -- well, sorry.**

10 **I -- I believe so, yes. And Facebook and**
11 Instagram have both really improved
12 their -- their inbox in recent months. It
13 used to be really wonky.

14 But, yeah, a few months ago with --
 15 with Facebook's kind of switch to Meta as the
 16 parent company, they did a complete overhaul
 17 of their inbox, where we receive DMs
 18 and -- and comment notifications.

19 And so they're much clearer now within
 20 the past, I would say four or five months,
 21 than what it used to be.

22 It was -- it was very glitchy. And I
 23 would -- I would miss a lot of content.
 24 Sorry. I don't know if it answered your
 25 question or I don't know if I answered the

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1 **regard reviewing comments, there -- like**
2 reviewing comment -- or the notifications for
3 comments are in the same area of the account
4 manager as our direct message inbox for both
5 Facebook and Instagram, but it's in a
6 different tab.

7 So I'll usually watch for direct
 8 messages, you know, throughout
 9 the -- throughout the day we usually have a
 10 few come in, you know, overnight.

11 And so in the morning -- as part of my
 12 morning rounds, I'll try to review messages
 13 and comments that came in throughout the
 14 night.

15 And then monitoring comments, I'll
 16 usually try to keep an eye on, you know, the
 17 first few minutes just to see if there's
 18 anything that pops up, somebody needs a
 19 response right away, depending on the subject
 20 matter.

21 And then, you know, if I -- well,
 22 I'll -- you know, we probably review it
 23 around, you know, 4:00 or 5:00 p.m. again,
 24 both the inbox and comments we've received.
 25 And then I -- I might check, you know, in the

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1 **specific question you asked.**

2 Q. That's okay.

3 With -- you said previously Facebook
 4 was glitchy and that you -- it was hard to see
 5 notifications when somebody was making a
 6 comment?

7 **A. Correct.**

8 Q. Was -- did Instagram have
 9 similar -- any similar problems?

10 **A. Yeah. It was a similar functionally.**
 11 **There would be times where the -- the desktop**
12 tool just completely unusable. And so I had
13 to resort to monitoring on my phone.

14 Q. How often would you have to do that?

15 **A. As-needed basis. But I would try to**
16 use the desktop tool whenever -- whenever
17 possible, just because it's easier to use on a
18 larger screen than a smaller phone screen.

19 Q. And this would be for -- for watching
 20 comments come in?

21 **A. Comments, interactions, yeah. I**
22 always just like to watch the like count just
23 to see -- you know, for strategy what time of
24 day to post content, or just how -- how
25 the -- how the Facebook or Instagram algorithm

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	81		83
1 is treating our piece of content.		1 commented on an older post within -- with a	
2 Q. Other than the -- other than the		2 comment that was auto moderated, would you get	
3 desktop version of the moderator tools not		3 a notification.	
4 working, what -- were there other glitches or		4 You said that was an area where	
5 technical problems that made it hard to		5 Instagram and Facebook were historically more	
6 moderate Facebook or Instagram in the past?		6 glitchy.	
7 A. Yeah. There -- there would be times		7 So what -- what did you think I meant	
8 where Instagram just wouldn't load comments		8 when I said "older"?	
9 for me, either on, you know, I'd -- I'd		9 A. When you said "older," I -- I took	
10 receive -- or I'd see that, you know, we had,		10 that as -- or I understood it as	
11 say, 49 comments on something -- on a post on		11 back -- I -- a comment on a post when Facebook	
12 Instagram. But I would click in and would		12 and Instagram were more glitchy in their	
13 only see, you know, several.		13 inbox.	
14 But then over time, maybe the next		14 Q. Oh, I see. Okay.	
15 day, I would be able to see all 49. It wasn't		15 What if somebody -- what if somebody	
16 consistent, but it had happened in the past.		16 posted on -- would a notification behavior on	
17 But in -- in recent months, both		17 Instagram or Facebook ever be different if	
18 Facebook and Instagram had really improved.		18 somebody made a comment on, let's say a	
19 Q. How often would this happen where		19 week-old Instagram post or Facebook post?	
20 comments wouldn't show up for a day or so?		20 A. Are we talking if the comment is made	
21 A. I'd say less than a dozen.		21 in present day?	
22 Q. Okay. If somebody -- if somebody made		22 Q. Yes.	
23 an on-topic post that was filtered by the auto		23 A. I believe we would receive a	
24 moderator on an old post, would you get a		24 notification either way.	
25 notification for that?		25 Q. Okay.	
	82		84
1 A. That particularly is where both		1 A. Granted, we receive sometimes hundreds	
2 Facebook and Instagram were rather glitchy.		2 of notifications, thousands of notifications	
3 Now, today, yes. But in the past, might. We		3 every day depending just on -- on the level of	
4 might be able to see that in the -- in the		4 engagement we receive.	
5 inbox, but not always.		5 And so, eyes -- we might receive a	
6 Q. And when you say "that," do you mean		6 notification, but eyes from an account manager	
7 any comments on an older post, or a comment		7 might not fall on that notification itself.	
8 from somebody who was being auto moderated?		8 Q. If somebody commented on a week-old	
9 A. Oh, sorry. Any comment. Whether or		9 post in 2020, would you receive a normal	
10 not they were auto moderated.		10 notification for that on Facebook and	
11 Q. So someone commented -- or		11 Instagram?	
12 historically, if someone commented on an older		12 A. Generally speaking, yes. But given	
13 post, you might not get a notification for it		13 the glitchy behavior that I described earlier,	
14 on Facebook or Instagram?		14 I -- I can't guarantee that Facebook or	
15 A. Might --		15 Instagram would deliver that notification.	
16 MR. KILPATRICK: I'm going to object.		16 Q. Would that glitchy behavior that you	
17 I'm going to object as to the use of the term		17 described apply to somebody commenting on a	
18 "old" as ambiguous.		18 post on Facebook or Instagram that was posted	
19 BY MR. BERRY:		19 the same day as their comment?	
20 Q. You can answer the question.		20 A. In my experience with just that type	
21 A. Might not. But, yeah, I -- I -- old,		21 of glitchy behavior, and when it came to	
22 if you're referring to -- I'm not sure what		22 notifications, Facebook and Instagram would be	
23 you mean by "old."		23 pretty good about recent -- so meaning day of	
24 Q. Well, I -- if you -- just a minute ago		24 or the day-before posts that were made by the	
25 I had asked if you would get -- if someone		25 university and notifications associated with	

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1 that.		1 cleared out old, old messages that had been	
2 But where it -- where it got glitchy		2 replied to, didn't -- we didn't need in our	
3 was dealing with posts made a week or two		3 inbox anymore, cleared all that out, and just	
4 prior and -- and further back.		4 tried to just like have it start fresh.	
5 Q. Was this -- was this glitchy behavior		5 And that -- that seemed to work a bit.	
6 something that was well known or discussed		6 And then soon after that is when Meta kind of	
7 in -- among social media specialists?		7 updated its -- its inbox.	
8 A. Yeah. I mean, so within the social		8 Q. Why would -- why would clearing out	
9 media team that we've built in university		9 messages help resolve this glitch?	
10 communications, we would err a lot of		10 A. It was just troubleshooting. I	
11 grievances about the -- the, you know, the		11 thought it might help.	
12 various Facebook tools and their level of		12 Q. Okay. Other than -- other than doing	
13 reliability.		13 this cleaning up, were there any other -- any	
14 Q. Did the glitchy behavior, did it have		14 other resources or research that -- that you	
15 a name?		15 looked into to help resolve the -- the glitchy	
16 A. I don't -- I don't believe so.		16 notification behavior that you were	
17 Q. Okay. Are there any -- any online		17 experiencing?	
18 communities or Web pages that -- that -- that		18 A. I -- you know, I -- I follow -- or I	
19 you -- that -- that talk about this sort of		19 don't follow, but I -- you know, I -- I look	
20 glitchy behavior with regards to comment		20 to certain, you know, tech publications that	
21 notifications on Facebook or Instagram?		21 usually try to provide, you know, tips for	
22 A. I -- I belonged to several online		22 social media platforms. And so I'm sure I	
23 communities and there might have been		23 performed a search or two just to look into	
24 discussion in there. But given the time where		24 the matter.	
25 this happened, I was mainly focused on just		25 But I -- to what I can recall, I	
	86		88
1 campus operations. This was -- this was		1 didn't see any sure-fire fix to the situation.	
2 primarily, you know, beginning of the pandemic		2 Q. Have you done any kind of -- have you	
3 when it was -- when it was -- I would -- I		3 done any kind of, like, cleaning up like that	
4 would associate, you know, most of the -- or		4 subsequently to the -- the time around	
5 up -- up to the -- the update several months		5 January 2021 when you...	
6 ago or whenever Meta took over and updated its		6 A. Yes. So since then and -- yeah.	
7 inbox. Prior to that time the inboxes, you		7 Since then I have, you know, tried to maintain	
8 know, were rather glitchy.		8 a much cleaner inbox so that we do have a	
9 So there could be -- there could have		9 higher probability of seeing new	
10 been discussion, but I don't think I ever		10 notifications.	
11 partook in those discussions within a broader		11 And just with the -- the redesign of	
12 community.		12 the inbox, it's just much clearer and easier	
13 Q. Did you ever -- did you ever take any		13 to -- to manage.	
14 steps to try to figure out what was causing		14 Q. Do you have any kind of -- are there	
15 this glitch?		15 any policies at the university that guide your	
16 A. Yeah. I mean, I would try to -- you		16 decision for cleaning up inboxes on social	
17 know, clear out the inbox every so often and,		17 media accounts?	
18 you know, just like check off notifications.		18 A. We don't have any social media	
19 I know there was -- I did a major		19 policies. We have the social media statement,	
20 sweep. It just got to the point of like, it		20 and we have the social media guidelines, and	
21 was nearly, you know, it -- it barely		21 the interim guidance from OLA or office of	
22 functioned for us. January of 2021 we were		22 legal affairs. I...	
23 missing -- we were missing a lot.		23 Q. Earlier you -- you mentioned that you	
24 And -- and so I went through just a		24 can get hundreds or even thousands of	
25 huge, kind of like spring cleaning, and just		25 interactions on social media every day that	

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	89		91
1	you're responsible for, for overseeing?	1	accounts?
2	A. Yes.	2	A. I look at the -- the number of likes
3	Q. Can you -- do you keep metrics	3	or reactions. I can also see the amount of
4	anywhere about precisely how many types of	4	shares and interactions and comments on those
5	social media interactions you get on a given	5	shares. And I -- I think I previously defined
6	day or any period of time for that matter?	6	what "sharing" means.
7	A. We have metrics available to us as	7	Also, yeah, you know, I can run like
8	account managers. Facebook and Instagram, you	8	Google searches with the URL of the specific
9	know, provide metrics.	9	post to see what kind of media pickup we might
10	But I -- I am not as producing --	10	be getting, you know, if someone has embedded
11	analytics and metrics are not within my	11	one of our social media posts in their news
12	day-to-day or even weekly or monthly job	12	story or -- or Web story, whatever that might
13	requirements.	13	be.
14	Q. How did you arrive at the -- at the	14	Q. So you're actively monitoring all --
15	range of hundreds to thousands a day of social	15	all of those different types of interactions
16	media interactions that that could happen?	16	on social media as, you know, on a daily
17	A. I remember seeing several Instagram	17	basis; is that right?
18	posts where it said more -- you know, more	18	A. Yeah. That's -- that's what I would
19	than 1,000 comments for a -- a post that was	19	consider social listening, which is just kind
20	made within that day or two and tracking	20	of monitoring traffic in all shapes and forms.
21	downward.	21	Excuse me.
22	Q. Do you remember what -- what that post	22	Q. Is anyone responsible for moderating
23	was about?	23	social media comments on the university's
24	A. I don't recall, no.	24	social media pages, other than you?
25	Q. Do you remember what the comments were	25	A. What do you mean by "responsible"?
	90		92
1	about?	1	Q. Does anyone else moderate comments on
2	Why were there so many comments on	2	the university's social media page besides
3	that one?	3	you?
4	A. Well, we can receive, you know, many	4	A. Yes. Mike Klein who is my supervisor.
5	notifications for a number of reasons. Say we	5	And prior to the interim guidance, you know,
6	win a national championship or a sports team	6	whoever was the social media lead for that day
7	does really well or, you know, the university	7	would typically handle just the all
8	has a high ranking in a certain, you know,	8	aspect -- you know -- you know, posting
9	U.S. News or Washington monthly ranking for or	9	outbound content and monitoring comments.
10	either the full university or a, you know,	10	They had the ability to moderate
11	particular program or aspect.	11	comments. Usually there would be a
12	Other times it's from spam campaigns	12	discussion, you know, if a question came up.
13	that I described earlier.	13	You know, but Mike and I ultimately took
14	Q. Sometimes you receive thousands of	14	responsibility for those and -- and would, you
15	comments that are related to what you describe	15	know, consult as necessary if we were able to
16	as a spam campaign, but other times you may	16	handle it, you know, within the social media
17	receive thousands of comments on a post that	17	team.
18	doesn't -- is not related to what you would	18	Q. Can you describe Mike Klein's role
19	call a spam campaign; is that right?	19	in -- in moderating on -- in particular
20	A. I don't think I would characterize it	20	what -- under what circumstances would Mike
21	that way. I mean, there are -- I can't put an	21	Klein be involved in a moderating activity?
22	entire comment section into one -- one bucket.	22	A. If he was social media lead for the
23	Q. Other than comments, what other kinds	23	day or if he in his own capacity was reviewing
24	of interactions do you watch as -- as they	24	social media comments or the inbox where we
25	occur on your university social media	25	received notifications for those at any time,

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	93		95
1 yeah.		1 THE WITNESS: I can easily do that.	
2 Q. And -- and you mentioned that		2 MR. KILPATRICK: Sorry. Maybe we	
3 after -- it was after the interim social media		3 should do 45 minutes, then.	
4 policy came out that the student interns		4 THE WITNESS: Is 1:30, does that	
5 stopped having the authority to moderate		5 sound -- kind of meet in the middle there.	
6 comments; is that accurate?		6 MR. BERRY: Let's not -- let's do	
7 A. No. The -- we received interim social		7 1:35.	
8 media guidance from office of legal affairs.		8 MR. KILPATRICK: Okay. 1:35 central	
9 It's -- it's not a policy. And we don't		9 time.	
10 actively have any intern -- student interns in		10 MR. BERRY: Central time, yep.	
11 managing any aspect of our university social		11 VIDEOGRAPHER: Okay. I'll bring us	
12 accounts.		12 off the record.	
13 Q. And why -- why don't you have interns?		13 The time is 12:53. We're off the	
14 A. For a while during the pandemic we had		14 record at the end of recording 2.	
15 a hiring freeze, and -- and so		15 (A short recess was had.)	
16 it -- everything fell to the professional		16 VIDEOGRAPHER: The time is 1:35.	
17 staff -- or I shouldn't say fell to. But		17 We're on the record at the start of recording	
18 that -- the -- the professional staff who we		18 3.	
19 already hired or already employed before the		19 MR. BERRY: Welcome back.	
20 hiring freeze, just had to take over all, you		20 Can we get Exhibit 21 back on	
21 know, account aspects.		21 the -- on the screen?	
22 We -- we didn't -- we didn't have any		22 And can we scroll down -- well,	
23 student interns to help with content creation		23 actually, stop there for a moment.	
24 or account management in any way. And I		24 Okay. That's good.	
25 just -- while we're still in the pandemic,		25	
	94		96
1 just haven't had the bandwidth to work on		1 BY MR. BERRY:	
2 hiring more students yet.		2 Q. Mr. Moll, at the bottom of the page,	
3 Q. And there -- you testified earlier, if		3 Exhibit 21 here, this is the -- the interim	
4 I recall correctly, that -- that the last time		4 guidance. It states that [as read]:	
5 you had interns was May 2021; is that		5 "To the extent that a --	
6 accurate?		6 users post on-topic	
7 A. 2020.		7 content that is	
8 Q. 2020, okay.		8 inaccurate, misleading or	
9 A. May 2020, yes.		9 critical of UW-Madison, or	
10 Q. All right. Well, I think we can -- I		10 any of its subunits to a	
11 know there was a request to break for lunch		11 formally affiliated	
12 around now. I'm happy -- I'm happy to break.		12 UW-Madison social media	
13 You know, is it -- is 35 minutes enough? I		13 page, social media	
14 know people might have other oblig-- -- we		14 managers may respond	
15 could go -- we could go to like -- what would		15 either with a reply or	
16 that be, 1:45 if we need to.		16 separate post. In these	
17 MR. KILPATRICK: I don't need that		17 responses, social media	
18 much. But, you know, 30 -- 30 minutes would		18 managers may clarify an	
19 be enough for me. But I'll defer to -- to		19 institutional position on	
20 Nate, if that's enough for him.		20 the topic, provide context	
21 THE WITNESS: Yeah. I -- 30 minutes		21 or factual information,	
22 is fine for me. I probably will need to run		22 and link to resources	
23 down the hill to -- to grab something to eat.		23 where users can find	
24 MR. KILPATRICK: Then maybe we		24 additional information."	
25 should --		25 Do you agree that's an accurate	

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1 representation of that paragraph?

2 **A. Yes, I do.**

3 Q. How would you determine if a -- if an

4 on-topic comment was inaccurate?

5 **A. There are a few different ways I could**

6 **determine that, based on my own institutional**

7 **knowledge from the time that I have spent here**

8 **in my professional role and -- and as an**

9 **undergrad.**

10 **Or, you know, quite often, I will, you**

11 **know, consult a KB document or knowledge-based**

12 **document, which that's just -- I kind of think**

13 **of it as like the Wikipedia of UW-Madison.**

14 **Or I can consult a subject matter**

15 **expert with the -- you know, the information**

16 **or the comments at hand.**

17 Q. And similarly, how would you determine

18 if an on-topic comment was critical of the

19 university?

20 **A. I'd say it's a case-by-case basis. It**

21 **depends on what the content of the comment is.**

22 Q. Have you ever -- have you ever

23 responded with a reply or a separate post

24 to -- to on-topic content that was inaccurate,

25 misleading, or critical?

1 **A. Yes, I have.**

2 Q. And how often have you -- have you

3 responded with a reply or a separate post with

4 such content?

5 **A. Yeah. I -- I don't keep a count or**

6 **analytics of, you know, what types of replies**

7 **I run. But in my time in this role for more**

8 **than eight years, I would say more than a**

9 **dozen.**

10 Q. Okay. And can you provide details

11 about -- about those comments where you

12 replied or created a separate post that

13 described the nature of -- of the comment and

14 the nature of the response?

15 **A. Excuse me. A -- I remember one**

16 **specific comment -- or I recall one that I can**

17 **speak about. There -- there was a rumor or**

18 **someone commented that a political candidate**

19 **was projecting a political ad on one of our**

20 **campus buildings, and, you know, felt that it**

21 **was critical -- or it seemed to be a critical**

22 **comment. They were criticizing the university**

23 **for supporting that -- that kind of, you know,**

24 **advertisement.**

25 **However, that -- that was untrue.**

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1 **There were -- excuse me -- there were**

2 **projection-style advertisements around**

3 **Madison, around, you know, downtown Madison.**

4 **But it did not occur on a university building.**

5 **And so I -- I ran a reply -- or at least I**

6 **directed whoever was the social media lead of**

7 **that day to run a reply to that person**

8 **clarifying that it did not -- it did not**

9 **happen at the university -- on a university**

10 **building.**

11 Q. Do you remember -- do you recall any

12 other incidents where you responded to an

13 inaccurate, misleading, or critical comment?

14 **A. Yeah. There are times where a**

15 **particular instructor will, you know, be in**

16 **the news cycle for any reason. And so there**

17 **will be a -- well, you know, we'll sometimes**

18 **see a comment to, you know, fire said**

19 **professor or, you know, take action against**

20 **that professor or instructor.**

21 **And -- and sometimes that instructor**

22 **or professor is not employed by UW-Madison.**

23 **Sometimes it's a completely different**

24 **university -- or outside of the UW system or**

25 **sometimes, you know, the -- the -- wherever**

99

100

1 **this commentor is getting their information**

2 **from, that source, you know, stopped short of**

3 **saying which University of Wisconsin campus at**

4 **which that instructor is employed.**

5 **And -- and so, you know, sometimes if,**

6 **you know, if we receive comments like that,**

7 **sometimes we'll run a reply saying this**

8 **instructor is not employed by the University**

9 **of Wisconsin Madison. They are -- and, you**

10 **know, could provide additional information,**

11 **like they are employed at a different**

12 **institution.**

13 Q. And would those comments criticizing

14 an instructor, were they in response to a post

15 about the instructor?

16 **A. None which I can recall, no.**

17 Q. Do you remember what the posts were

18 where these comments about instructors

19 appeared?

20 **A. I -- I don't recall, no.**

21 Q. Is it possible that the posts where

22 people were commenting about an instructor

23 were not specifically about that instructor?

24 **A. Sorry. Could you repeat the question?**

25 Q. Is it possible -- is it possible if

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1 the posts were not about the instructor, even 2 though they were receiving comments about the 3 instructor? 4 A. Yes, that's possible. 5 Q. Okay. And then in a situation like 6 that, why -- why wouldn't you just remove the 7 post for being off topic? 8 Excuse me. I misspoke. 9 In a situation like that, why wouldn't 10 you remove the comment for being off topic? 11 MR. KILPATRICK: Objection. I'm going 12 to object. It's a hypothetical question to 13 which he didn't respond -- never said he would 14 not remove it. 15 BY MR. BERRY: 16 Q. Answer the question. 17 A. I -- I do recall in -- about the 18 projection misinformation that this 19 was -- this occurred on Facebook, and this 20 was, you know, just a one -- one question that 21 we received about it. 22 And so I guided the social media lead 23 at the time to, you know, reply correcting 24 that -- that person -- or at that commentor. 25 And I -- I believe I directed them to	101 1 point -- you know, make -- point any more 2 attention at that comment. It had nothing to 3 do with the original post. Yeah. 4 Q. So -- so sometimes for an off-topic 5 comment, you may do a response, and sometimes 6 you might hide it? 7 A. Yes. That has occurred in the past. 8 Q. And is -- is that -- is that 9 decision -- whether to moderate a comment or 10 whether to respond to it, one that's in your 11 discretion, or is that somebody else that 12 makes that decision? 13 A. It could be mine. It could be Mike 14 Klein. It could be John Lucas. 15 Q. Okay. Can a -- 16 MR. BERRY: We can -- if we can, take 17 that exhibit off the screen. 18 BY MR. BERRY: 19 Q. The university -- the social media 20 pages is for the university in general; right? 21 A. Yes. It represents like the top level 22 university on social media. 23 Q. Can a comment that criticizes the 24 university for practices that the university 25 implements ever be off topic on a university	103
1 then kind of hide the comment. And that was 2 because, A, the comment itself was off topic, 3 but it was just very easy to, you know, matter 4 of factually say, this did not happen. 5 But when -- like as I've kind of 6 built -- described the algorithm before, 7 Facebook and Instagram will sometimes, you 8 know, sort comments by default by, like the 9 most relevant or top comments. However 10 Facebook or Instagram determines that, I'm not 11 sure. 12 But from my experience, I have seen on 13 Facebook where if the university does reply to 14 a comment on one of its posts, Facebook will 15 automatically bring that comment kind of to 16 the -- the top of the list. 17 And so because, you know, this -- this 18 comment was off topic, but it was just very 19 easy to, you know, run a reply and correct, 20 and, you know, make a factual statement. 21 I -- I directed the social media lead 22 to make -- to make that comment, but then hide 23 that comment, I guess, thread, so that it 24 didn't go to the top of that comment section. 25 Because there really wasn't a reason to	102 1 page or on a university post rather? 2 A. On an individual post, yes. It can be 3 off-topic. 4 Q. So you make that determination on the 5 post, and not -- not -- not with regard to the 6 account being about the university in general? 7 A. Correct. I make that determination 8 based on the individual's social media posts 9 made by the university. 10 Q. Could comments that are -- that 11 praised the university in general, would those 12 be off topic if they occurred on a post that 13 wasn't about the university? 14 A. I guess, yeah. I mean, it's -- it's 15 tough to say. It really depends on -- on 16 the -- the contents of the -- of -- of the 17 comment. You know, I can -- you know, 18 for -- for instance, sometimes, you know, 19 we'll -- we'll post about a recent university 20 ranking. And I'll -- we'll use the phrase in 21 our social media copy, like, "say it with us 22 on Wisconsin," with which is a general phrase 23 that's associated with the university. That's 24 kind of like a you-rah-rah-style comment. 25 And so, like, a comment doesn't	104

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	105		107
1 necessarily have to contain words included in 2 the university's social media post to be 3 determined to be on topic. 4 For instance, like I had mentioned 5 before, you know, if a user will comment and 6 tag one of their friends, a -- I mean, what I 7 have described, you know, the -- the top 8 comments versus all comments or how Facebook 9 or Instagram kind of ranks those comments, 10 those always fall to the bottom as the least 11 relevant as I've -- as I've seen how Facebook 12 kind of ranks those.		1 or off topic. 2 Q. So the university had several 3 controversies concerning racial inequity in 4 the past year; is that -- is that correct? 5 A. Generally, yes. 6 Q. And -- and to your knowledge, have 7 comments made on the university's Instagram or 8 Facebook pages criticizing the university's 9 practices with regards to racial inclusivity? 10 Yeah. So have comments been made on 11 the university's Instagram social media pages 12 criticizing the university's practice with 13 regards to racial inclusivity?	
13 But, you know, me tagging at, you 14 know, Christopher Berry in -- in a comment, 15 it's my intent that you look at this specific 16 social media post to get your attention to 17 look at it. 18 Q. And even -- even if -- even if someone 19 is not tagging one of their friends, could 20 they respond to a post and be -- and be on 21 topic for that post, even if -- even if 22 their -- their comment doesn't use the same 23 words as the post or include any of those same 24 words as the post?		14 A. I believe I have seen comments about 15 that, yes. 16 Q. And had those comments always been 17 made on posts on the university's accounts 18 that relate to race or diversity? 19 A. I -- I can't answer without looking at 20 a specific comment. 21 Q. Okay. And have you ever moderated 22 comments criticizing the university's 23 practices with regards to -- to racial 24 inclusivity for any reason?	
25 MR. KILPATRICK: Objection;	106	25 A. It's a really broad topic. Again,	108
1 speculation. 2 BY MR. BERRY: 3 Q. You can answer the question. 4 A. I -- I don't know if I understand the 5 question. Could you please rephrase it? 6 Q. Does a comment have to include the 7 same words as the post in order for it to be 8 on topic? 9 A. It doesn't have to. It's not a 10 requirement. 11 Q. Does it have to -- so does a comment 12 have to include any synonyms of words in the 13 post to be on topic? 14 A. No. 15 Q. And so -- so what standard do you use 16 to determine whether something is on topic or 17 off topic? 18 A. Context in -- yeah, you need to just 19 look at the context. 20 Q. When you say that -- that you need to 21 look at the context, you mean you or whoever 22 is moderating that particular -- 23 A. Correct. When considering 24 a -- moderating a social media comment, you 25 need to look at the context of it for being on	1 I -- I would need to see the context of -- of 2 the comment in question. 3 MR. BERRY: Can we pull up and mark as 4 Exhibit 22, the November 17, 2020, Instagram 5 post? 6 (Whereupon, Moll Deposition 7 Exhibit No. 22 was marked 8 for identification.) 9 BY MR. BERRY: 10 Q. So I can represent this a screenshot 11 of the university's @UW-Madison Instagram page 12 reflecting a post made on November 17, 2020. 13 Do you recall this post? 14 A. Yes, I do. 15 Q. And what's the topic of this post? 16 A. Can I get a moment to read the -- the 17 caption of it? 18 Q. Take your time, yes. 19 A. Thank you. 20 Okay. So this is an Instagram post 21 about COVID-19 public health guidance directed 22 towards students as we approach the 23 Thanksgiving recess and winter break. 24 Q. And you can see one comment from the 25 screenshot. What's the topic of the content?		

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	109		111
1 A. The topic of the -- the comment or --		1 reviewed that comment when they received a	
2 Q. Correct. What's -- what's the topic		2 notification for it, to the best of their	
3 of the -- of the one comment visible on this		3 ability, of course. Is that -- that's correct	
4 exhibit?		4 as well?	
5 A. It says [as read]:		5 A. I would say so, yes.	
6 "Shut down the money		6 Q. Okay.	
7 laboratories."		7 A. But we -- we don't watch notifications	
8 With three, looks like sad face		8 as they occur. It's usually playing catch-up	
9 emojis.		9 or sometimes just not seeing it at all.	
10 Q. Does that -- does that relate to the		10 There -- yeah.	
11 topic of the post?		11 Q. Mm-hmm. Okay. Now, there -- I can	
12 A. No, it does not.		12 represent, there are comments that aren't	
13 Q. And why -- why would this comment		13 visible because this is just one -- one small	
14 still be visible, then, even if it -- even if		14 Screenshot of the post.	
15 it is not relating to the topic of the post?		15 But the -- the university did produce	
16 A. I -- I don't know when this screenshot		16 some -- some additional comments to this	
17 was made. As I mentioned before, social media		17 particular post.	
18 comment -- or social media posts are living		18 MR. BERRY: So I'd like to pull those	
19 documents, and so I'm not sure.		19 up and mark as Exhibit 23, UW0242.	
20 Q. In general, you would have received a		20 (Whereupon, Moll Deposition	
21 notification that -- the day that the comment		21 Exhibit No. 23 was marked	
22 was made, even if that comment was made		22 for identification.)	
23 after -- long after the post was created; is		23 BY MR. BERRY:	
24 that correct?		24 Q. Are you famil- -- are you familiar	
25 A. Looking at -- so the post was made		25 with this document?	
	110		112
1 67 weeks ago on November 17, 2020. And the		1 A. I've seen this document before.	
2 comment below was made six weeks later. We		2 Q. And what -- and what -- and what is	
3 likely would have received a notification.		3 this document marked as Exhibit 23?	
4 But I can't guarantee that, you know, any		4 A. This is a screenshot of a comment	
5 eyes -- you know, that any social media		5 section on Instagram.	
6 managers specifically saw that notification		6 Q. Okay. And I can represent that these	
7 about this specific comment.		7 comments are posted to the November 17, 2020,	
8 Q. Is it a -- is it the practice to		8 post that we just had up as Exhibit 22,	
9 review every comment as it comes in on -- on		9 according to -- to the university's	
10 social media posts?		10 interactions with us in this case.	
11 A. As I said before, to the best of our		11 Do you have any reason to doubt that	
12 ability, try to, you know, monitor and -- and,		12 representation?	
13 you know, practice social listening to review		13 A. I can't verify it myself. But I -- I	
14 comments.		14 trust that you're representing it accurately.	
15 But -- and again, that's to the best		15 Q. So we'll proceed with the assumption	
16 of our ability. Just -- we are a large		16 that these comments are in response to	
17 account and don't always see every single		17 that --	
18 comment.		18 A. Yeah.	
19 Q. So -- so Instagram should have		19 Q. -- Exhibit 2020 -- excuse me, the	
20 provided a notification for this, even though		20 Exhibit 22 post.	
21 it occurred six weeks after the original post;		21 There are three comments at the bottom	
22 is that correct?		22 that I'm interested in, the last three. So	
23 A. Should have. And I -- yeah.		23 let's -- let's take a look at those.	
24 Q. And -- and whoever was responsible		24 What -- what's the -- what is the	
25 for -- for listening that day should have		25 topic of the -- of the first of the three	

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	113		115
1	comments by a user named Sarah?	1	A. That comment was moderated because the
2	A. This comment is inquiring about	2	user had an account level restriction placed
3	students of color, and in relation to a	3	on it.
4	specific employee on campus.	4	Q. Okay. That looks like there's an
5	Q. Is that -- is that the controversy	5	option there to approve or delete?
6	around an instructor that we were talking	6	A. Correct.
7	about a little -- a little bit ago?	7	Q. And fair to assume that that comment
8	A. I -- in my recollection earlier, I	8	had not been approved to appear on the page,
9	wasn't referring to this specific instructor	9	that it had remained auto moderated; correct?
10	or employee. I -- I couldn't tell you which	10	A. Correct.
11	employee this -- at this time. I couldn't	11	Q. And that -- that all three of those
12	tell you which employee this was about since	12	comments you -- you would have received
13	this occurred in November 2020.	13	notifications when these comments were made?
14	Q. Okay. But it is about protecting	14	A. Yes.
15	students of color from an employee?	15	Q. I also -- for each of those three
16	A. Yeah, yes.	16	comments there's a -- below them on each one
17	Q. Yes. And the -- and the comment after	17	17 says "12W." Do you see where it says that?
18	that, can you describe what the -- what the	18	A. Yes.
19	topic around that comment is?	19	Q. And so what does that indicate?
20	A. I would assume in a similar vein,	20	A. That indicates the -- that the comment
21	protecting, you know, students of color.	21	was made 12 weeks ago. So 12 weeks since this
22	Q. And they -- and they use an acronym	22	screenshot was taken.
23	there, BIPOC. Do you have an understanding	23	Q. Okay. So would -- would it be fair to
24	of -- of what that acronym refers to, either	24	say that if -- if there was going to be any
25	what it means specifically or just what it	25	moderation decision with regards to the
	114		116
1	refers to generally?	1	particular comment, that those would -- that
2	A. Yes, I do.	2	those would have occurred 12 weeks ago when
3	Q. And what is that understanding that	3	the comments were made?
4	you have?	4	A. Sorry. Could you repeat that
5	A. Well, black, indigenous, or people of	5	question?
6	color, BIPOC.	6	Q. What -- wouldn't it be -- would it be
7	Q. Okay. And then can you read the last	7	fair to say that if any moderation to
8	comment then, the one at the very bottom of	8	the -- either to moderate or to unmoderate one
9	that Exhibit 23?	9	of those comments was going to be made, that
10	A. [As read]:	10	10 that -- that that moderation decision would
11	"@UW-Madison, close down	11	11 have been made 12 weeks prior to the
12	your primate research	12	12 screenshot?
13	labs."	13	A. Generally, we -- we try to stay active
14	Q. Okay. So were any of those comments	14	14 on our most recent, you know, Facebook or
15	moderated?	15	15 social media posts.
16	A. At that time of the screenshot, the	16	16 But, yes, sometimes we -- we don't get
17	bottom comment was moderated.	17	17 all of them, or don't review all of them.
18	Q. And -- but the other two comments	18	Q. How often would you say you go back
19	relating to students of color, those were not	19	19 and mod- -- make any kind of moderation
20	moderated; is that correct?	20	20 decision with regards to a 12-week-old
21	A. At the time of the screenshot, no.	21	21 comment?
22	Q. Okay. And why -- why was that -- why	22	A. Not very often.
23	23 was that comment at the bottom, "close down	23	Q. Is it -- is it the practice to
24	24 your primate research labs"?	24	24 moderate -- to make a moderation decision on
25	Why was that comment moderated?	25	25 the comment as they come in as they receive

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	117		119	
<p>1 notifications about them?</p> <p>2 A. Most often as they come in or after a</p> <p>3 period of a few hours based on the workday and</p> <p>4 the workload associated with that workday.</p> <p>5 Q. So typically, a moderation decision</p> <p>6 to -- with regards to a comment would be made</p> <p>7 within a day of the comment being made?</p> <p>8 A. I would say within several days.</p> <p>9 Q. Okay. So with regards to</p> <p>10 the -- what -- would you say that the two</p> <p>11 comments about -- about protecting students of</p> <p>12 color, are those -- are those on topic with</p> <p>13 regards to the staying safe from COVID during</p> <p>14 Thanksgiving break, are those on-topic</p> <p>15 comments or off-topic comments?</p> <p>16 A. I don't know the nature of the</p> <p>17 complaint of the employee. And so I -- I</p> <p>18 can't determine whether or not it's on or off</p> <p>19 topic.</p> <p>20 Q. Could you imagine a circumstance under</p> <p>21 which an employee could be endangering the</p> <p>22 students with regards to COVID?</p> <p>23 A. Yes, I could.</p> <p>24 Q. Okay. And can -- I mean, can you just</p> <p>25 describe what that situation might look like</p>		<p>1 in that comment?</p> <p>2 A. In that jatzy comment there is --</p> <p>3 there is no specific reference to a university</p> <p>4 employee.</p> <p>5 Q. So the only reason that they could be</p> <p>6 considered on topic is because it might be</p> <p>7 relating to something having to do with COVID,</p> <p>8 but you -- you wouldn't know that by looking</p> <p>9 at the comment that it had anything to do with</p> <p>10 COVID; is that fair to say?</p> <p>11 A. At this time, I -- I wouldn't know.</p> <p>12 Q. So can you describe that -- earlier</p> <p>13 you said based on context is how you determine</p> <p>14 what's on topic.</p> <p>15 So can you walk me through whether you</p> <p>16 think these are on topic, and if so, what the</p> <p>17 context is that makes you believe that they're</p> <p>18 on topic?</p> <p>19 A. So, again, I don't recall the details</p> <p>20 around this employee. But at the time could</p> <p>21 have -- could have -- it -- it com -- a</p> <p>22 complaint about a university employee could</p> <p>23 have been brought forth about COVID protocols.</p> <p>24 I don't know at this time or I can't recall.</p> <p>25 And so if -- if that was a complaint</p>		
<p>1 that would cause you to conclude that it was</p> <p>2 on topic?</p> <p>3 A. If -- if a -- if an employee was not</p> <p>4 following public health guidance and</p> <p>5 university COVID policy or procedures and, you</p> <p>6 know -- you know...</p> <p>7 Q. Do you have any reason to think that</p> <p>8 that -- that's -- a COVID protocol violation</p> <p>9 was occurring with -- with regards to</p> <p>10 the -- to these -- to these two comments about</p> <p>11 protecting students of color?</p> <p>12 A. I don't know. I don't recall the</p> <p>13 specific instance of the complaint against</p> <p>14 this employee, so I'm not sure. But...</p> <p>15 Q. Okay. There -- to clarify, there is</p> <p>16 no -- it -- do you see the name of an employee</p> <p>17 listed in those comments as we look at them?</p> <p>18 A. No, I do not.</p> <p>19 Q. And with regards to the second</p> <p>20 comment, which says [as read]:</p> <p>21 "Start protecting your</p> <p>22 BIPOC students @UW</p> <p>23 Madison"...</p> <p>24 Would you agree that there's not even</p> <p>25 a reference to any -- any university employees</p>	118		<p>1 brought toward -- brought forth about a</p> <p>2 university employee violating COVID protocols,</p> <p>3 that would be on topic given the post was</p> <p>4 about public health guidance about COVID-19.</p> <p>5 Q. If the -- if pivoting to the -- to the</p> <p>6 comment that was moderated and -- and hidden,</p> <p>7 which was close down your primate research</p> <p>8 labs, if there was any primate research going</p> <p>9 on that was relevant to COVID, would that --</p> <p>10 would that make that comment on topic, then,</p> <p>11 under -- under this context?</p> <p>12 MR. KILPATRICK: Objection;</p> <p>13 speculation.</p> <p>14 BY MR. BERRY:</p> <p>15 Q. Answer the question.</p> <p>16 A. I guess if it -- it was relevant, yes.</p> <p>17 Q. Okay. So potentially the -- the close</p> <p>18 down your primate research labs comment was on</p> <p>19 topic, depending on context and other</p> <p>20 information that's not apparent from -- from</p> <p>21 the comment itself that -- that's correct?</p> <p>22 A. There's a potential for it.</p> <p>23 But -- but like the other two comments above</p> <p>24 it, I'd say it would all -- all three would be</p> <p>25 stretches to be considered on topic.</p>	120

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	121		123
1 Q. Okay. If all three are stretches to 2 be considered on topic, why -- why was one 3 comment hidden but the other two were not? 4 A. There was an account level -- there's 5 an account level restriction placed on -- on 6 the bottom comment for the Madeline Krasno 7 account.		1 about whether the university primate research 2 ever relates to COVID-19 research? 3 A. I don't have any personal knowledge, 4 no.	
8 There were not account level 9 restrictions placed on the other two comments 10 in question.		5 Q. And what -- when would -- when would 6 you decide whether to -- you know, to 7 investigate whether something that's 8 potentially on topic is, in fact, on topic 9 versus when you wouldn't make efforts to 10 investigate that background context? 11 A. It's -- it's, I think it's context 12 dependent, but I would also, you know, rely on 13 those resources I -- I spelled out earlier, 14 subject matter expert or KB doc or general 15 institutional knowledge.	
11 Q. Have you -- 12 A. But that would have resulted in a 13 manual moderation for the other -- 14 (Indiscernible simultaneous 15 colloquy.)		16 Q. Okay. So -- so would it be fair to 17 say that's a judgement -- a judgment call that 18 the moderator, such as yourself, would make 19 depending on the context, whether to do 20 additional research or not? 21 A. Yes.	
16 BY MR. BERRY: 17 Q. As you stated earlier, you would have 18 received a comment that the close down your 19 primate research lab comment was made; that's 20 correct? 21 MR. KILPATRICK: Objection; 22 mischaracterizes previous testimony. 23 BY MR. BERRY: 24 Q. Would you have received -- should 25 Instagram have given you a notification when		22 Q. Okay. So now we have before us 23 Exhibit 24. Can you -- and this is a post 24 from the university's Facebook account. 25 Can you -- can you just describe	
1 that auto moderated comment was made? 2 A. I believe so, but given that 3 this -- yeah, this post was from 4 November 2020, which was before the inbox 5 updated it's very possible we received a 6 notification, but might not have seen it in 7 the inbox.	122	1 the -- what this post is? 2 A. Yeah. I can't see -- oh, no, it's 3 fine. It's not within the screenshot. 4 I can't see any social copy associated 5 with this post. But generally, this 6 is -- this is promoting an event, the Martin 7 Luther King symposium on Monday, January 25th.	124
8 MR. BERRY: Can we do -- can we move 9 on to another exhibit, then, marked as -- I 10 think this will be marked as Exhibit 24, the 11 file name is UW0245. 12 (Whereupon, Moll Deposition 13 Exhibit No. 24 was marked 14 for identification.)		8 Q. And can I have you look at 9 the -- there's a -- some comments there. It 10 looks like there are several comments that 11 appear to have been hidden; is that accurate? 12 Is that what the -- I'm actually color 13 blind. I think that's a -- I think that's a 14 yellow box with grayed-out comments? 15 A. Yes. That's a yellow box, but...	
15 BY MR. BERRY: 16 Q. And while we're -- we're pulling that 17 up, with regards to the last -- to the last 18 exhibit with the auto moderated comment, have 19 you -- have you undergone any -- any effort to 20 research whether the University of Wisconsin's 21 primate research is related to COVID-19 in any 22 way? 23 A. I haven't done any personal research, 24 no.		16 Q. And those are all comments that -- 17 that have been moderated; correct? 18 A. Correct.	
25 Q. Do you have any personal knowledge		19 Q. Can you describe what -- can you tell 20 how they were moderated? 21 Was this by -- were they -- were they 22 actively hidden or did they -- were they auto 23 moderated? 24 Do you have any idea being able to 25 tell how they were moderated?	

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	125		127
1 A. I can't tell from this screenshot, no.		1 (Whereupon, Moll Deposition	
2 Q. Okay. I'd like to direct your		2 Exhibit No. 25 was marked	
3 attention to the second-to-last comment here		3 for identification.)	
4 from a Suzie Cook.		4 BY MR. BERRY:	
5 Well -- and actually, before		5 Q. And are you familiar with this	
6 we -- yeah, to Suzie Cook.		6 document?	
7 And does her comment violate the		7 A. Sorry. I -- could you zoom in a	
8 off-topic comment policy or -- let me rephrase		8 little bit, please? It's a little blurry.	
9 that. Not using the word "policy."		9 Thank you.	
10 Does Suzie Cook's comment qualify as		10 Oh, yes, I am familiar.	
11 on-topic or off-topic?		11 Q. And what is it?	
12 A. Well, the interim guidance on -- on or		12 A. This is a screenshot of a comment	
13 off topic was developed in the spring of 2021.		13 section from a UW-Madison Instagram post.	
14 THE WITNESS: And you -- if you could,		14 Q. And what's the topic of the post?	
15 scroll up, please.		15 A. Let's see. I believe this was a photo	
16 This was an event -- promoting an		16 from our moments in time series where we	
17 event on January 25th. So I can't see the		17 shared kind of the photographer's choice from	
18 original date of the post. But I would assume		18 throughout the past year.	
19 that this was an in-person event. So it		19 It's kind of like a year-end recap.	
20 occurred before we shut down for the pandemic.		20 And this specific post was about a terrier	
21 So this was January 2021. So this was		21 receiving a health checkup at Dane County	
22 before the interim guidance was provided to		22 Humane Society.	
23 social media managers.		23 Q. And all three of those comments were	
24 BY MR. BERRY:		24 moderated. And the first one has a yellow box	
25 Q. Regardless of whether it occurred		25 that's been added around it.	
	126		128
1 before or after the interim guidance,		1 My understanding that -- that means it	
2 what -- what's your view as you -- as you sit		2 was automatically hidden with the auto	
3 here today, what is your view about whether		3 moderator.	
4 that comment is on topic or off topic?		4 Does that -- does that comport with	
5 A. I'm sorry. Can you repeat the		5 your understanding?	
6 question?		6 A. I believe so, yes.	
7 Q. Yeah. As you sit here today,		7 Q. What -- why would this comment have	
8 what -- what is your view about whether Suzie		8 been restricted?	
9 Cook's comment is on topic or off topic?		9 A. Because it -- it may have contained a	
10 A. As I sit here today, Suzie Cook		10 word or phrase that was in our auto moderator.	
11 mentioned Martin Luther King. So I would		11 Q. And what's the -- can you just read	
12 consider this comment to be on topic.		12 off the full comment that was automatically	
13 Q. Okay. Were you involved in moderating		13 moderated?	
14 the comment?		14 A. Oh [as read]:	
15 A. I don't recall. I wouldn't even be		15 "Stop testing on innocent	
16 able to lookup -- Facebook doesn't have that		16 monkeys."	
17 level of activity log. I don't recall who or		17 Q. What -- what word or words in that	
18 how this comment was moderated.		18 comment may have been filtered by the auto	
19 Q. Okay. If we could move on to the --		19 moderator?	
20 to the next exhibit, then?		20 A. I'm not sure. I -- I would need to	
21 MR. BERRY: I'd like to mark it -- I		21 see the list at the time that this comment was	
22 think we're on 25. And the file for this		22 made.	
23 should be UW0284.		23 Q. Okay. And does that comment	
24		24 violate -- excuse me. Is that -- is the stop	
25		25 testing on innocent monkeys comment on topic	

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	129		131
1 or off topic?		1 of this post or not?	
2 A. I'd say this was off topic.		2 A. Sorry. Could you repeat the question?	
3 Q. And why is it off topic?		3 Q. Yeah. I'm trying to understand	
4 A. The comment says "stop testing on		4 would -- would this be -- would you consider	
5 innocent monkeys." The Instagram post is		5 it to be comments about research on monkeys at	
6 about a terrier, I assume a dog, receiving a		6 the university to be on topic insofar as	
7 health checkup at the humane society.		7 university employees are -- are caring for the	
8 Q. Okay. The last com- -- the last		8 monkeys at the university, just as the	
9 sentence of the -- of the university's post on		9 university shelter medicine program employees	
10 this exhibit, says that [as read]:		10 are -- are caring for -- for animals as well?	
11 "The -- the university's		11 A. I still think this post is about	
12 program, quote, provides a		12 household pets. So I -- I don't think that	
13 needed resource for		13 monkeys would fit into this -- would be -- I	
14 at-risk animals, and for		14 think that monkeys would be off topic.	
15 those who care for them		15 Q. Moving on to the second comment there,	
16 each day."		16 this has a red box. I understand that means	
17 End of quote. Is that -- that's an		17 it was manually hidden; is that correct?	
18 accurate summary?		18 A. Correct.	
19 A. Yes.		19 Q. And this one doesn't refer to monkeys.	
20 Q. Would -- would monkeys used in		20 It says [as read]:	
21 research, would you consider them to be		21 "You all do not care about	
22 at-risk animals?		22 animals. You literally	
23 A. I'm not sure. I believe, like, this		23 have some locked up in	
24 post is about pets as it's, you know, humane		24 cages there and testing on	
25 society. It's about the humane society, and		25 them. Leave them alone.	
	130		132
1 that -- a UW veterinary medicine program.		1 How would you feel being	
2 Q. Did humane societies exclusively deal		2 in a cage?"	
3 with -- with pets or companion animals or can		3 Would you read that that post is about	
4 humane societies ever -- ever end up		4 animals generally, not monkeys specifically?	
5 sheltering animals that aren't used as pets?		5 A. About animals generally, yes.	
6 A. I don't know.		6 Q. And is that -- is that comment on	
7 Q. Did you do any research to find out		7 topic or off topic?	
8 whether the Dane County Humane Society or the		8 A. Given my interpretation at this moment	
9 shelter medicine program at the University of		9 or what?	
10 Wisconsin ever deal with non- -- non pet or		10 Q. Yeah. Just standing here right now,	
11 non companion animals?		11 do you think that this is on topic or off	
12 A. I did not.		12 topic?	
13 Q. Okay. And at this -- the end of the		13 A. Standing here right now, I would say	
14 post talks about those who care for them each		14 that this comment is on topic as it talks	
15 day referring -- referring to the at-risk		15 about animals. And we refer to at-risk	
16 animals; correct?		16 animals -- or animals in -- in the -- the	
17 A. I believe that refers to the human		17 caption.	
18 caretakers.		18 Q. Was there a time where you would have	
19 Q. Okay. So with -- the human caretakers		19 thought this was off topic?	
20 at the university's shelter medicine program		20 A. Prior to interim guidance from office	
21 and at the humane society?		21 of legal affairs, yes, I would have thought	
22 A. Yes.		22 this was off topic.	
23 Q. So would -- would people -- people		23 Q. And why -- and why is that?	
24 caring for -- for university employees caring		24 A. Talking about, like, animal testing	
25 for animals, that -- is that within the topic		25 when the post itself is about a pet receiving	

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	133		135
1 a health checkup at the humane society.		1 journal sentinel online -- or a journal	
2 Q. So at one point you would have		2 sentinel article about Martin Luther King	
3 considered that off topic. But now sitting		3 Junior speaking to UW-Madison. And you have	
4 here today you consider that to be on topic?		4 Milwaukee students after winning the Noble	
5 A. Correct.		5 Prize.	
6 Q. Okay. Is -- is there -- is there		6 Q. And moving to the comments made by	
7 anything in -- in that interim guidance		7 Rosy Tree, the second comment there, that's a	
8 specifically that that informs this change of		8 yellow -- a yellow box suggest- -- indicating	
9 opinion that you could -- that you can		9 that it had been automatically moderated; is	
10 identify?		10 that correct?	
11 A. I think generally, the interim		11 A. The color coding only applied to	
12 guidance just helped me better understand the		12 Instagram comments. The boxes around Facebook	
13 definition of off topic and the gray area of		13 comments are just marking comments that were	
14 both on- and off-topic content.		14 hidden in general.	
15 Q. Were you personally involved in		15 Q. Is there -- is there any way to tell	
16 moderating both of these hidden comments in		16 whether Rosy Tree's comment was hidden -- what	
17 the red box on this Exhibit 25?		17 was moderated manually or automatically?	
18 A. I was the one that took this		18 A. I can't tell from this post, no.	
19 screenshot and -- and marked the boxes. So,		19 Q. Okay.	
20 yes, I was.		20 A. Or the screenshot.	
21 Q. And, okay. Did you -- in -- in making		21 Q. Can you -- her -- Rosy Tree's comments	
22 the decision to -- to hide the comments on		22 said [as read]:	
23 Exhibit 25, did you -- did you do any research		23 "I don't think Dr. King	
24 about whether the university's shelter		24 would approve of your lab	
25 medicine program does any animal testing or		25 electrocuting innocent	
	134		136
1 provides any services to animal research		1 monkeys. Please put an	
2 occurring in the university?		2 end to the animal torture	
3 A. I did not.		3 that is happening at your	
4 Q. Okay. Did you think to do any kind of		4 university."	
5 research like that to determine		5 And then it -- it includes a link to a	
6 whether -- whether these -- you know,		6 petition, according to the URL.	
7 potentially on-topic comments were, in fact,		7 Is that an accurate characterization	
8 on topic or not?		8 of what we see for that comment?	
9 A. At the time, no.		9 A. Yes.	
10 Q. Okay.		10 Q. And is their comment on topic or off	
11 MR. BERRY: Can we move on to the next		11 topic?	
12 exhibit. I will mark it 26, file name UW0262		12 A. Well, in terms of on or off topic,	
13 or -- yeah, 0262, yes.		13 Rosy Tree mentions Dr. King, which the -- the	
14 (Whereupon, Moll Deposition		14 original post is about.	
15 Exhibit No. 26 was marked		15 But I also wanted to point out that	
16 for identification.)		16 there are other criteria for which stages in	
17 BY MR. BERRY:		17 the social media statement for which we can	
18 Q. I believe -- are you pretty familiar		18 hide or moderate a comment.	
19 with this document?		19 Q. Okay. Are -- were you -- were	
20 A. Yes. This is a screenshot of a		20 you -- were you involved in moderating this	
21 Facebook post -- part of a post in a comment		21 comment?	
22 section.		22 A. I don't recall.	
23 Q. And what -- what is the topic for the		23 Q. And what -- you mentioned that there	
24 post that we've marked as Exhibit 26?		24 are other reasons besides being off topic.	
25 A. A-- this is a partial screenshot of a		25 So what reasons -- what other reasons,	

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	137		139
1 if any, do you think would justify hiding this 2 comment?		1 (Whereupon, Moll Deposition 2 Exhibit No. 28 was marked 3 for identification.)	
3 A. Well, I see a link to a petition, 4 which promoting an outside -- I considered it 5 a promotion, and promotions are a -- one of 6 the criteria for an outside organization.		4 BY MR. BERRY: 5 Q. Okay. Are you familiar with this 6 document?	
7 Sorry. A petition for an outside 8 organization is one of the grounds for 9 moderating a comment.		7 A. Yes, I am. 8 Q. And what is it?	
10 Q. Is there any indication here that 11 that -- that an organization is behind the 12 petition?		9 A. This is a screenshot of an Instagram 10 comment section on a university -- on a 11 UW-Madison Instagram post.	
13 A. Well, it's a website top-level domain 14 is onegreenplanet.org. Dot org is usually 15 received for organizations.		12 Q. And turning to the comment by 13 Ms. Krasno, the second comment from the top 14 there, does -- does that comment violate 15 the -- excuse me.	
16 Q. Other than the dot org URL suffix, is 17 there any other indication that this was 18 promoting an organization through that link?		16 Is Ms. Krasno's comment on topic or 17 off topic?	
19 A. Not that I can see. But in this 20 screenshot there is the link to see more. 21 That -- the full comment is not displayed in 22 this screenshot. So there may be other 23 content that Rosy Tree included in this 24 comment that we can't currently see.		18 A. [As read]: 19 "Something innocuous." 20 It's -- I would probably consider it 21 off topic. I don't know. I don't know what 22 it means.	
25 Q. And there's a --		23 Q. Well -- 24 A. But it -- it could be on topic. I 25 don't know. It's one of those kind of gray	
	138		140
1 MR. BERRY: Can we move on to the next 2 exhibit, which we can mark as 27. This should 3 be file name UW0144. 4 (Whereupon, Moll Deposition 5 Exhibit No. 27 was marked 6 for identification.)		1 areas. 2 Q. And how -- how would you go about 3 this -- deciding that and whether this is on 4 topic or off topic? 5 A. I'd probably consult legal. 6 Q. Did you consult legal on -- on this	
7 BY MR. BERRY: 8 Q. And do you -- are you familiar with 9 this document?		7 one? 8 A. I don't believe I did. 9 Q. Okay. And this was -- this -- this	
10 A. I am, yes. It's a screenshot of the 11 page settings and for university's Facebook 12 account. And it is a screenshot of the 13 section called "page moderation" where it's 14 the list of words or phrases that the 15 university included to auto moderate Facebook 16 comments.		10 post was made on February 24, I believe 2021. 11 A. Correct. 12 Q. Which is after February 11, 2021, when	
17 Q. Okay.		13 you -- when you took over -- sorry. 14 So -- would -- would -- so would	
18 MR. BERRY: Actually, can we -- I 19 think I have -- I think I had maybe a dyslexic 20 moment here. I meant to say UW0114 not 144.		15 February 24, 2021, would you have been the one 16 responsible for moderating comments, then, or 17 would there have been anyone else moderating 18 with you?	
21 So can we put that exhibit aside and 22 mark the next one as 28, then?		19 A. Me or Mike Klein. 20 Q. And what percentage of the time would	
23 And this should be the 114. I'm 24 sorry.		21 it be you versus Mike Klein making a 22 moderation decision on a post like this?	
25		23 A. Percentage of time, I'd probably give 24 it 80 percent, 80, 85.	
		25 Q. Eighty or 85 percent of the time you	

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	141		143
1 would be the one --		1 about processing the Derek Chauvin trial and	
2 A. I would -- sorry. Yes, yes.		2 as it relates to diversity, equity, and	
3 Q. Okay.		3 inclusion on campus.	
4 A. I didn't mean to talk over you.		4 Q. Turning to the comment by Ms. Krasno,	
5 Sorry.		5 does -- does -- is her comment on topic or off	
6 Q. Oh, no, it's -- I mean, I talked over		6 topic, the second one on this exhibit?	
7 you.		7 A. Yeah, sorry. I need to read it here.	
8 And now Ms. -- Ms. Krasno had been		8 I'd consider this comment on topic.	
9 previously moderated due to what you viewed as		9 Q. Okay. And was the comment moderated?	
10 off-topic comments prior to this; correct?		10 A. I don't believe so. It appears here.	
11 A. Correct.		11 Q. Okay. And what -- and why is it on	
12 Q. So why -- why wouldn't this comment		12 topic? Why do you think it's on topic?	
13 have been moderated as well?		13 A. It states this is a very important	
14 A. Yeah. So with account-level		14 post. We are currently talking about racial	
15 restrictions -- well, I -- for this comment		15 injustice and systemic oppression. And	
16 specifically, the account-level restriction		16 this -- the Instagram post is essentially	
17 had been removed.		17 about racial and -- in the -- in the caption	
18 Q. Okay. And it's a -- in this -- this		18 there we talk about, you know, racial justice.	
19 comment does not pertain to primate research;		19 Q. Okay. Would you have been -- were you	
20 is that correct?		20 involved in moderating a comment or not -- or	
21 A. I don't believe so, no.		21 deciding whether to moderate or not moderate	
22 Q. Okay.		22 it?	
23 MR. BERRY: Can we go to -- can we go		23 A. This is -- yeah, this is after, what,	
24 on to Exhibit 29, mark it as Exhibit 29, file		24 end of February, so, yes, yeah.	
25 name UW0115?		25 Q. And can -- can you explain how you	
	142		144
1 (Whereupon, Moll Deposition		1 determined that the comment did not need to	
2 Exhibit No. 29 was marked		2 be -- actually, we can scratch that.	
3 for identification.)		3 Would you have thought that that	
4 MR. BERRY: And, sorry, this for the		4 comment was on topic at the time it was made?	
5 reporter. This is -- this is 29; right? I		5 A. Yeah, I believe so. Because we	
6 just want to make sure I have it properly...		6 received the interim guidance on on- or	
7 STENOGRAPHER: Yes.		7 off-topic comments in the spring of 2021.	
8 MR. BERRY: Twenty-nine, okay.		8 Q. Okay.	
9 BY MR. BERRY:		9 MR. BERRY: Can we -- I'd like to move	
10 Q. Are you familiar with the document		10 on. Mark as Exhibit 30 the file named	
11 marked as 29, Mr. Moll?		11 "capture April 19, 2021," Instagram post.	
12 A. Yes.		12 (Whereupon, Moll Deposition	
13 Q. And -- and can you describe what		13 Exhibit No. 30 was marked	
14 this -- what this exhibit is?		14 for identification.)	
15 A. This is a screenshot of an Instagram		15 BY MR. BERRY:	
16 comment section on UW-Madison post, Instagram		16 Q. And this is how -- this is a post as	
17 post.		17 it appeared two days ago as we sit here. And	
18 Q. And what's the topic of the post?		18 it's a screenshot of the -- of the same -- as	
19 A. This is a message from a chancellor		19 the same post.	
20 addressing the Derek Chauvin -- oh, yeah,		20 Would you agree that the -- that	
21 Derek Chauvin, and -- and George -- so as		21 the -- that the post itself is the same	
22 associated, George Floyd on the Black Lives		22 between Exhibit 29 and Exhibit 30?	
23 Matter movement.		23 A. This -- this is the same Instagram	
24 But this post specifically is a		24 post, yes. The April 19, 2021, yeah.	
25 message from the chancellor, kind of talking		25 Q. Yes. And the "45W" underneath the	

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<p>1 comments, what would the "45W" indicate?</p> <p>2 A. That the comment was made 45 weeks ago.</p> <p>4 Q. Forty-five weeks from the -- the date</p> <p>5 of the screenshot; correct?</p> <p>6 A. Sorry, yes. The date of the screenshot.</p> <p>8 Q. Okay. There are a few -- there are a</p> <p>9 few comments there relating to racial and</p> <p>10 animal justice.</p> <p>11 Do you -- do you see those comments?</p> <p>12 A. Well...</p> <p>13 Q. For example, one comment -- I'll be</p> <p>14 more specific. One comment says -- about</p> <p>15 racial justice and then animal justice. Do</p> <p>16 you see that comment?</p> <p>17 A. Yes, I do.</p> <p>18 Q. And then there's a comment just above</p> <p>19 that, it says [as read]:</p> <p>20 "Best to go learn something</p> <p>21 about racial justice and</p> <p>22 animal welfare. Just an</p> <p>23 idea."</p> <p>24 Do you see that comment as well?</p> <p>25 A. I do.</p>		<p>1 I would consider both of those off topic.</p> <p>3 Q. What about the -- the comment that's</p> <p>4 an eye roll emoji, is that -- is that comment</p> <p>5 on topic or off topic?</p> <p>6 A. I'm not sure.</p> <p>7 Q. If you were -- if you were -- if you</p> <p>8 were moderating this today, let's say that</p> <p>9 comment was posted today and you were making a</p> <p>10 decision whether to moderate it or not, what</p> <p>11 would you decide to do?</p> <p>12 A. I'd probably contact legal.</p> <p>13 Q. How often do you contact legal to</p> <p>14 help -- to guide whether to make a moderation</p> <p>15 decision with regards to a comment?</p> <p>16 A. Yeah. So I would -- I would say -- well, it -- it's a case-by-case basis.</p> <p>18 I don't have a set, you know, meeting or, you know, a -- I don't have a set calendar</p> <p>20 appointment to talk to legal about any given</p> <p>21 topic. So I just reach out as needed.</p> <p>22 Q. If you -- if you had to guess, what</p> <p>23 would the frequency be, once a day, once a</p> <p>24 week, once a month, once a year?</p> <p>25 Is there a frequency with which you</p>	
<p>1 Q. Are these -- are those comments on</p> <p>2 topic or off topic?</p> <p>3 A. They mention racial justice. So I would consider them on topic.</p> <p>5 Q. Okay. And -- okay. There were a</p> <p>6 couple other comments. There's a comment that</p> <p>7 is just -- that's an eye roll, and then also a</p> <p>8 comment that says "Cornelias" with exclamation</p> <p>9 points.</p> <p>10 Do you see those comments on this</p> <p>11 Exhibit 30?</p> <p>12 A. Yes, I do. Near the bottom?</p> <p>13 Q. Yes.</p> <p>14 A. Yeah.</p> <p>15 Q. Are those topics on topic or off</p> <p>16 topic?</p> <p>17 A. Those comments -- well, I would consider the comment "release Cornelias" --</p> <p>18 there are two there at the bottom [as read]:</p> <p>20 "Release Cornelias. It's been ten long years. How many more decades?"</p> <p>23 And then the very bottom comment [as</p> <p>24 read]:</p> <p>25 "Release Cornelias."</p>	146	<p>1 reach out to legal about questions relating to</p> <p>2 moderation?</p> <p>3 MR. KILPATRICK: Objection; calls for</p> <p>4 speculation.</p> <p>5 BY MR. BERRY:</p> <p>6 Q. Answer the question.</p> <p>7 A. I -- I really -- I really don't know.</p> <p>8 If's -- it's on a -- you know, a case-by-case basis. And it -- it's only dependent on what</p> <p>10 types of comments we receive. I can't predict</p> <p>11 what types of comments we'll receive.</p> <p>12 Q. Okay. Earlier we -- in the -- in the</p> <p>13 social media statement and the interim</p> <p>14 guidelines -- guideline, we -- we -- you</p> <p>15 acknowledged previously in this deposition</p> <p>16 that -- that you may remove comments for being</p> <p>17 off topic, but that you're not required to; is</p> <p>18 that correct?</p> <p>19 A. Correct.</p> <p>20 Q. And -- and so in a situa- -- with</p> <p>21 regards to the eye rolling emoji, what -- why</p> <p>22 would you take the time to contact legal about</p> <p>23 a moderation decision when you're not required</p> <p>24 to moderate it at all?</p> <p>25 A. Because I was asked the question about</p>	148

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1 it.		1 Q. And what's the topic of the post?	
2 Q. And you -- and your response is that		2 A. I need to, quick, read it here.	
3 you would contact legal in -- in deciding		3 Q. Take your time.	
4 whether to -- whether to leave it or whether		4 A. Generally speaking, this is a news	
5 to moderate it; correct?		5 story about the COVID -- or the virus that	
6 A. Correct. Comments with strictly		6 causes COVID-19, and research performed on	
7 emojis or one emoji, yeah, those are tough. I		7 campus to determine when pneumonia is caused	
8 don't know.		8 by the COVID-19 disease.	
9 Q. Without -- you don't have		9 Q. Okay. And turning -- if we could	
10 to -- without saying what legal told you, have		10 scroll down just a little bit, there's	
11 you ever reached out to legal about a single		11 a -- looks like a hidden -- a hidden comment	
12 emoji comment in the past?		12 from a Warren Knapp.	
13 A. Not that I can recall.		13 Do you agree that's -- that's a hidden	
14 Q. Okay. We can move on.		14 comment?	
15 MR. BERRY: Would you be okay with		15 A. That is a hidden comment, yeah.	
16 taking a ten-minute break right now, and then		16 Q. And it states that [as read]:	
17 make we just get back and --		17 "Did you figure that out by	
18 (Indiscernible simultaneous		18 using abused monkeys?"	
19 colloquy.)		19 Is that accurate representation of the	
20 MR. KILPATRICK: 3:10?		20 comment that was hidden?	
21 MR. BERRY: Is that okay?		21 A. Yes, it is.	
22 MR. KILPATRICK: Yeah. 3:10?		22 Q. And how was the comment moderated?	
23 MR. BERRY: 3:10.		23 A. I'm not sure. Either manually or	
24 MR. KILPATRICK: Okay. Good.		24 automatically, but I can't tell from the	
25 VIDEOGRAPHER: Then we're going off		25 screenshot.	
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1 the record. The time is 3:01.		1 Q. And if it was automatically moderated,	
2 (A short recess was had.)		2 that would have been through use of forbidden	
3 VIDEOGRAPHER: The time is 3:16.		3 word or phrase; correct?	
4 We're on the record at the start of recording		4 A. Another word or phrase that was added	
5 4.		5 to the auto moderation list on Facebook.	
6 BY MR. BERRY:		6 Q. Okay. Where -- were you -- were you	
7 Q. All right. Welcome back. Let's -- I		7 involved in moderating the comment?	
8 want to go through a few more posts here right		8 A. I don't know. I don't recall.	
9 now.		9 Q. And the -- do you -- do you think that	
10 MR. BERRY: What -- what exhibit are		10 the comment is on topic or off topic?	
11 we on right now?		11 A. This one's hard to say. Yeah.	
12 TECHNICIAN: The next exhibit will be		12 This -- this is a gray area. I'm not sure.	
13 Exhibit 31.		13 Q. Is there -- any reason why -- well,	
14 MR. BERRY: So can we do file UW0358,		14 would it be possible in your role as a social	
15 and mark that as Exhibit 31?		15 media manager to provide a response to the	
16 (Whereupon, Moll Deposition		16 question?	
17 Exhibit No. 31 was marked		17 A. It would be possible, yes.	
18 for identification.)		18 Q. And what would -- what would factor in	
19 BY MR. BERRY:		19 your decision to -- to keep it hidden or to	
20 Q. For Exhibit 31, can -- are you		20 hide it rather than providing an answer to the	
21 familiar with this -- with this document?		21 question?	
22 A. Yes, I am.		22 A. I mean, there are a number of factors.	
23 Q. And what is it?		23 This comment specifically depends on, you	
24 A. This is a screenshot of a U of Madison		24 know, what time of day, and just the	
25 Facebook post.		25 circumstance in which, you know, we saw the	

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<p>1 comment, and whether or not a subject matter 2 expert was available to answer questions about 3 it, or if -- or if the question is even 4 answerable. Those are the first few that come 5 to mind.</p> <p>6 MR. BERRY: Moving on, can we pull up 7 files UW0274 and mark that as Exhibit 32? 8 (Whereupon, Moll Deposition 9 Exhibit No. 32 was marked 10 for identification.)</p> <p>11 BY MR. BERRY:</p> <p>12 Q. For this Exhibit 32, Mr. Moll, are you 13 familiar with this document?</p> <p>14 A. Are you able to scroll up?</p> <p>15 Oh, yes. I mean, I -- I took the 16 screenshot. So I'm familiar with it.</p> <p>17 Q. And in the -- and can you describe 18 what the document is?</p> <p>19 A. This is a screenshot of a UW Facebook 20 comment section.</p> <p>21 Q. And what's the topic of the post?</p> <p>22 A. That's where I was asking to scroll 23 up, but we just got the tail end, kind of the 24 headline. The headline states [as read]:</p> <p>25 "UW startup data chat</p>		<p>1 grounds for hiding the comment.</p> <p>2 Q. Okay. And can I have you look at the 3 very -- the top comment on -- on this exhibit, 4 it says [as read]:</p> <p>5 "Are you aware that Bascom 6 Hall was shown on Young 7 Sheldon last night? So 8 cool."</p> <p>9 Do you see that comment?</p> <p>10 A. I do so that comment.</p> <p>11 Q. Was -- is that comment on topic or off 12 topic?</p> <p>13 A. Just by reading the headline 14 the -- about data chat, I don't believe this 15 comment would be on topic.</p> <p>16 Q. There -- who would have been involved 17 in the decision whether to -- whether to 18 moderate the Young Sheldon comment?</p> <p>19 A. I'm not sure when this Facebook post 20 was made. So it -- it could have been anybody 21 on the social media team in the university 22 communications.</p> <p>23 Q. Do you -- do you think that that 24 comment should have been hidden with regards 25 to the Young Sheldon show?</p>	
<p>1 democratizes data 2 science."</p> <p>3 Q. And the -- there's a couple comments 4 that -- that are hidden. Would you agree with 5 that?</p> <p>6 A. Yes.</p> <p>7 Q. And one of the comments by Raven 8 Flores is hidden. Can you -- can you describe 9 what -- whether that comment is on topic or 10 off topic?</p> <p>11 A. This is -- the comment was -- they 12 just either typed in manually or pasted in a 13 URL to a WRT radio station website.</p> <p>14 And the headline is about an animal 15 rights group suing UW-Madison for allegedly 16 hiding critical comments on social media.</p> <p>17 Q. Is that -- is that comment -- well, 18 first question: Is that comment on topic or 19 off topic?</p> <p>20 A. I would consider this off topic.</p> <p>21 Q. And would -- would there be any other 22 reason to moderate this comment, besides being 23 off topic?</p> <p>24 A. By looking at it here, I -- I think 25 that justify it being off topic would be</p>	154	<p>1 A. It is -- well, based on what I can see 2 in the screenshot, I believe that it is off 3 topic. So it -- it could be hidden or 4 moderated.</p> <p>5 Q. So why -- why would the -- why would 6 the comment about the animal rights group 7 suing the university for hiding comments, why 8 would that be moderated, but the comments 9 about Young Sheldon would not be moderated?</p> <p>10 A. I'm -- I'm not sure. It just depends 11 on -- on the -- the social media lead at that 12 time, how closely they were monitoring 13 comments or, yeah, if -- yeah. I'm not sure.</p> <p>14 Q. Okay. If we can --</p> <p>15 MR. BERRY: We can take the exhibit 16 down.</p> <p>17 BY MR. BERRY:</p> <p>18 Q. We've been talking quite a bit 19 about -- about decisions -- about whether to 20 moderate or not moderate particular comments 21 on posts.</p> <p>22 I want to -- I want to pivot just for 23 a moment up to -- to account level 24 restrictions.</p> <p>25 How do you decide whether</p>	156

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1 to -- whether to restrict an entire account on 2 the university's Facebook or Instagram social 3 media versus simply moderating comments that 4 they make?		1 appear as if they're impersonating Facebook. 2 I think one is called, like page disable. I 3 don't recall the name of the other account. 4 But in both instances, they -- these	
5 A. Sure. Well, we need a -- I want to 6 draw a line of distinction that re- -- like an 7 account-level restriction on Instagram is 8 different than an account level restriction on 9 Facebook, so far as that there is a specific 10 tool on Instagram called restrict that does 11 not exist on Facebook. So I just -- I just 12 want to make that -- that clear.		5 accounts will send the UW-Madison Facebook 6 page a direct message where it's threatening 7 to disable the account or -- or you have a 8 copyright infringement claim or something of, 9 you know, that nature where it's -- the 10 message states something to the effect of, 11 like if you don't take action on this, your 12 account will be -- or your page will be 13 disabled or taken down or -- you know, and 14 then they provide a link to click where you 15 can take action to not have your page taken 16 down. But those accounts are fake. You know, 17 it's not represented by Facebook.	
13 Q. And what -- other than restriction, 14 other than -- excuse me. Other than an 15 account restriction, what other kind of 16 account level moderation actions can be taken, 17 if any?		18 And so it's -- I would call it like a 19 scam or phishing attempt. And so to protect 20 our account and, you know, other social media 21 staff that might see that comment -- or that 22 that -- that direct message to, you know, 23 protect our account, I -- you know, decided 24 that this -- this is a nefarious, malicious 25 account looking to, you know, take over our	
18 A. Facebook and Instagram both give you 19 the -- the option to block or ban a user from 20 a page or from -- from an account.			
21 Q. What does it mean?			
22 A. That's the only other account level 23 restriction you can place.			
24 Q. Is that -- is blocking and banning, 25 are those the same -- are those synonymous			
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1 actions, or do they mean two different things? 2 A. I think those are synonymous.		1 page or whatever. So I blocked those accounts 2 for the protection of our Facebook page.	
3 Q. Is -- does the university block people 4 from its social media accounts?		3 Q. Have you ever blocked or banned an 4 account for -- for making repeated off-topic 5 comments?	
5 A. No. Not an account level block or -- 6 or ban. I -- yeah.		6 A. Block or ban, no.	
7 Q. So at -- when the university takes an 8 account level action against somebody, it's 9 only -- it's only to restrict the account, but 10 not to fully block it?		7 Q. Okay.	
11 A. On Instagram, yes.		8 A. On -- on Facebook, no. Sorry, just to 9 make sure --	
12 Q. And not on -- is that true for 13 Facebook as well that that -- accounts are not 14 blocked?		10 Q. Have you ever blocked or banned on 11 Instagram?	
15 A. There are several instances of -- they 16 are Facebook accounts, but they're not tied 17 to, like a person that we -- I -- we have 18 blocked in the past.		12 A. Blocked or banned, no.	
19 Q. And what reason have you blocked 20 people on Facebook in the past?		13 Q. And on Instagram, have you -- have you 14 restricted an account for -- for making 15 off-topic comments?	
21 A. Sure. So --		16 A. Yes.	
22 Q. Blocked accounts on Facebook.		17 Q. Okay. Just pin that for a second.	
23 A. Thank you, yeah.		18 Are -- how are political comments 19 treated with regards to social media 20 moderation on the university social media 21 pages?	
24 So the -- the nature of these -- I can 25 recall two accounts. They are both trying to		22 A. Yeah. Political comments are 23 complicated. You know, we do post a lot -- or 24 we do post frequently about elections and, you 25 know, registering to vote and the democratic	

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1 process. You know, we're considering our 2 demographic of, you know, sometimes first-time 3 voters as -- as university students, we take 4 the role of educating our audience in -- in 5 the steps to register, to find your polling 6 place. You know, all the aspects to -- all 7 the aspects involved in the voting process, 8 but not who to vote for. That's where we draw 9 a very strict line.		1 or fit into several other criteria listed in 2 the social media statement. 3 Q. Okay. And you -- you also -- you 4 mentioned having to call Mike and Meredith to 5 talk about handling -- handling potentially 6 harmful comments. I was wondering if you 7 can -- what was the -- what was the result of 8 your discussion with them?	
10 And in terms of comment moderation, 11 that's where I also draw a strict line to not 12 allow -- or not host any conversations about 13 specific candidates.		9 A. You know, I -- I don't recall that 10 specific conversation. Or, yeah, I don't -- I 11 don't recall the specific conversation or the 12 result of it.	
14 You know, folks are welcome to talk 15 about the democratic process and -- and 16 voting, but cannot campaign for a specific 17 candidate. And so, yeah, that's where I draw 18 the line, is -- is at specific candidates, you 19 know, where -- where applicable.		13 Q. At the -- a person that you're having 14 a conversation with had suggested going back 15 up to the first page here, at the bottom of 16 the first page, that "not sure what to do with 17 the women are the real victims comments."	
20 MR. BERRY: Can -- can we mark UW0520 21 as an exhibit and pull that up?		18 And then curious, if you could -- if 19 you could explain how -- if you could, just 20 explain how that -- how that's harmful under 21 this discussion.	
22 (Whereupon, Moll Deposition 23 Exhibit No. 33 was marked 24 for identification.)		22 A. Sorry. I just need a quick read over 23 this thread to get more context here.	
25		24 Q. Go ahead. Take your time.	
	162		164
1 BY MR. BERRY: 2 Q. Do you see that? 3 A. I see that, yes. 4 Q. Can you describe what Exhibit 33 -- 5 A. This appears to be a screenshot of a 6 Microsoft Teams chat thread. 7 Q. Okay. And so at the bottom you -- you 8 mentioned harmful comments. So your last -- 9 your last message in this thread talk about 10 the merits of hiding harmful comments. 11 Do you see that? 12 A. I see it, yes. 13 Q. What -- what makes a comment harmful? 14 A. As like, I believe in my mindset. 15 Here, a harmful comment would be stating 16 something that could bring harm to someone or 17 a group of people, whether physically, 18 emotionally, mentally or other form of harm. 19 Q. Okay. And what's your view about 20 whether harmful comments can be moderated? 21 A. Well, I feel like it fits the -- into 22 the criteria in our social media statement 23 in -- in several categories based on the 24 content of the -- the comment in question. 25 It could be threatening or injurious	1 question, please? 2 Q. Yeah. So the -- the person you're 3 talking with mentions -- says "not sure what 4 to do with the women are real victims 5 comments." And then it goes on to say "I'm 6 inclined to hide as harmful." 7 Can you -- can you explain 8 what -- whether those "women are the real 9 victims comments--"are harmful? 10 A. I am not sure which specific comments 11 that this person is referring to. You know, 12 I -- it looks like they're probably 13 summarizing. And, you know, they were 14 bringing a concern to me about, you know, the 15 nature of these comments, that they deemed to 16 be harmful, but -- you know, as it related to 17 people of color and Asian Americans. And so I 18 thought that I would take that concern to my 19 supervisor. 20 Q. Do you remember if those comments were 21 ultimately -- any of those comments were 22 ultimately moderated or not as a result of 23 that discussion? 24 A. I -- I don't recall. 25 Q. Okay. I want to --		

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1 MR. BERRY: Can we pull up UW0449 and 2 mark it as a new exhibit? Sorry. I think 3 it's 0449. I may have misstated that. 4 TECHNICIAN: 0449? 5 MR. BERRY: Yeah, that's right. 6 TECHNICIAN: Thank you, sir. 7 (Whereupon, Moll Deposition 8 Exhibit No. 34 was marked 9 for identification.)		1 university relations social media guidelines. 2 Q. And do you -- and what's your 3 understanding of what it -- what that means? 4 A. Yeah. I -- I described it previously. 5 But at -- generally speaking, it's where we'll 6 receive, you know, a wave of comments that are 7 typically encouraged or -- or directed 8 by -- by a campaign or a viral news story or 9 any -- you know, any media that's trying to, 10 you know, encourage others to go and -- and 11 comment. 12 And -- and typically, these -- these 13 spam comments are very similar in nature. 14 They'll either take, you know, the words 15 verbatim or use other very -- sometimes very 16 colorful and sometimes threatening language. 17 Q. And the -- and this -- this -- your -- 18 this understanding of what spam is, is 19 that -- is that based on your -- your 20 experience or is this based on a definition 21 that you've consulted somewhere? 22 A. This is based on my experience. 23 Q. Okay. Going back to this social media 24 plan, including to -- to, quote, monitor 25 antianimal research comments, wha- -- can	
10 BY MR. BERRY: 11 Q. Are you familiar with this document 12 marked as Exhibit 34? 13 A. Yes. 14 Q. And what is Exhibit 34? 15 A. This is a screenshot of a Microsoft 16 Teams chat in the -- the message thread used 17 by the social media managing staff. 18 Q. Okay. At the very -- on the last 19 message it says [as read]: 20 I'm social media lead 21 today. Plan includes"... 22 And then the third bullet point there 23 is [as read]: 24 "Monitor antianimal 25 research comments. Big	166		168
1 thanks to Nate for 2 covering this this 3 morning." 4 Do you see that, that comment? 5 A. Yes. 6 Q. And what -- how -- can you explain to 7 me what it means to monitor antianimal 8 research comments? 9 A. Yeah. So in relation to this 10 conversation and what I had just previously 11 said, 50-plus PETA comments on our Instagram 12 posts, this would be considered a -- a -- like 13 a spam campaign. These -- and so usually 14 we'll see just waves of comments coming in 15 that are almost always off topic to the -- the 16 post or posts in which users are commenting. 17 And so it's just monitoring the 18 situation and seeing where potentially 19 this -- this campaign is coming from. 20 Q. Okay. Is -- you used the word "spam" 21 in your response previously. Is -- is "spam" 22 a term that's defined by any university 23 documents or -- or guidelines that you've 24 obtained? 25 A. I believe spam is mentioned in the		1 you -- what makes something an antianimal 2 research comment? 3 A. A -- I think that in -- with the 4 nature of many of these types of comments we 5 receive, you know, a spam comment is not 6 always an antianimal research comment. I want 7 to make that clear. 8 What makes an antianimal research 9 comment that is, typically speaking, a comment 10 that will say something like, stop animal 11 testing, or shut down your lab. And, you 12 know, it -- it can also be, rot in hell you 13 bastards, you know, I wish cancer upon your 14 unborn children. Yeah. They can be very 15 simple or very threatening. 16 Q. In your view, would a -- would a 17 comment promoting -- asking to promote more 18 cruel animal research, would that be 19 antianimal research? 20 A. Sorry. Could you restate that? 21 Q. Mm-hmm. Would a -- would a comment 22 advocating for -- in favor of -- of cruelty 23 and animal research, would that be -- would 24 you consider that an antianimal research 25 comment or -- or other?	

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1 A. I guess -- I guess that would be -- I 2 guess that would be diff- -- I guess that 3 would be different. I don't -- I don't think 4 we ever received a comment like that before.		1 A. Yes, I do. 2 Q. And what is this document? 3 A. This is a screenshot of a Microsoft 4 Teams chat with the social media -- the 5 university communications social media 6 managers.	
5 But by, you know, we're dealing with 6 negatives and -- or maybe double negatives 7 here. It's hard to interpret. 8 Q. But do -- do you have any personal 9 views about animal research?		7 Q. Okay. And do you see at the bottom of 8 your top comment there it says [as read]: 9 "Monitoring animal rights." 10 Is that accurate?	
10 A. Honestly, not really. I -- you know, 11 given my -- my -- you know, role at the 12 university, I -- I read, you know, a lot of 13 new stories, some of which involve animal 14 research as -- as part of a, you know, 15 particular research study. 16 But I -- I don't hold any particular 17 opinions about it myself.		11 A. Yes, I do. 12 Q. How do you -- how do you monitor 13 animal rights? 14 A. This might have been just shorthand, 15 similar to, you know, monitoring antianimal 16 research comments in the past that we referred 17 to in a previous exhibit.	
18 Q. Have you ever read anything about the 19 university that's critical of animal research? 20 A. Have I read anything that's -- sorry. 21 Could you restate the question? 22 Q. You said you -- you read stories 23 relating to the university and animal research 24 that -- that occurs there; is that -- is that 25 correct?		18 Q. Okay. How do you feel about other 19 social justice issues? 20 Putting animal rights aside, how do 21 you feel about social justice issues in 22 general, personally? 23 A. I think -- I mean, I -- I'm passionate 24 about racial justice and inequities. I, you 25 know, am a firm believer in the -- the	
1 A. That is correct in the sense that it's 2 part of a research study. 3 Q. Right. And research study that is 4 occurring at the university? 5 A. Correct. 6 Q. This says -- okay. You can just drop 7 that question entirely, actually. 8 What about your view about -- not just 9 animal research specifically, but do you have 10 an opinion about animal rights in general? 11 A. I -- I really don't. Sorry. I'm just 12 not a very opinionated person. 13 MR. BERRY: Can I -- can we mark as 14 Exhibit 35, UW0701? 15 (Whereupon, Moll Deposition 16 Exhibit No. 35 was marked 17 for identification.) 18 TECHNICIAN: I apologize, Counsel. 19 Would you mind repeating that number? 20 MR. BERRY: UW0701. 21 TECHNICIAN: Thank you, sir. I just 22 misheard. My apologies. 23 BY MR. BERRY: 24 Q. And do you recognize this document 25 marked as Exhibit 35?	170	1 environmental impacts that fossil fuels have 2 on -- on our planet, and just, you know, being 3 eco-friendly. 4 I care a lot about LGBTQ plus rights. 5 Those are some of the areas that I -- I 6 personally care about. 7 Q. How do you feel about the 8 environmental impact from -- from animal 9 agriculture, for example? 10 A. I don't have a strong opinion about 11 that specific issue. I just, you know, as 12 I -- you know, the -- the areas I stated 13 before are, you know, very broad topics. 14 I've seen how agriculture runoff can 15 affect the phosphorus levels in the lakes in 16 Madison that -- you know, I -- I see the 17 negative effects. I don't know the full story 18 or, you know, the full impact of it. But I 19 have seen how it has a negative effect on, you 20 know, a lake in my backyard. 21 Q. Okay. So it's -- just to make sure I 22 understand, then, you -- you're passionate 23 about environmental issues insofar as 24 it's -- there's pollution caused by fossil 25 fuels, and also animal agriculture runoff that	172

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1 affects your -- your backyard?		1 subconscious level that your -- that your	
2 A. Well, not just my back -- well, that's		2 personal political views could have a -- some	
3 an example. I'm particularly interested in		3 impact on the moderation decision that you	
4 alternative energy, so like, solar and wind.		4 make?	
5 Q. And why is that?		5 MR. KILPATRICK: Objection;	
6 A. I -- so I was -- I had -- one of my		6 speculative.	
7 majors was environmental studies in my		7 BY MR. BERRY:	
8 undergrad at UW-Madison. And I guess that's		8 Q. You can answer the question.	
9 just -- you know, in -- there's a, you know,		9 A. It's -- it's possible. You know, but	
10 wide breadth of courses you can take. And		10 I -- I try to -- as I mentioned, I try to	
11 just the particular path I took just -- yeah,		11 be -- I try to remove, you know, personal	
12 I saw, you know, the -- the benefits of, you		12 beliefs and biases when functioning in my	
13 know, weaning off of fossil fuels and turning		13 official role.	
14 more towards our alternative fossil fuels,		14 Q. Okay. Moving on, we -- we talked	
15 like solar and wind and -- and other, you		15 about account restrictions previously. And	
16 know, renewable resources.		16 the university restricted Ms. Krasno's	
17 VIDEOGRAPHER: I'm sorry to interject.		17 Instagram account from September 2020 through	
18 I seem to be having some problem with my		18 January 2021; is that correct?	
19 connection. I wonder if we could go off the		19 A. I believe so, yes.	
20 record for a moment. If I could restart my		20 Q. And were you involved in the decision	
21 router, I think it will fix it. I never had		21 to restrict Ms. Krasno's Instagram account?	
22 this issue before, but it's skipping on and		22 A. I very likely was the one that	
23 off now.		23 performed the restriction, yes.	
24 MR. BERRY: That's totally fine with		24 Q. And -- and why did you restrict	
25 me.		25 Ms. Krasno's Instagram account?	
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1 VIDEOGRAPHER: Okay. I'll just bring		1 A. I had noticed a pattern of -- a	
2 us off for a moment.		2 consistent pattern of off-topic comments. And	
3 The time is 4:00 o'clock. It's the		3 so for that reason, and I -- I used a tool	
4 end of recording 4.		4 that Instagram came out with, I don't think	
5 (A short recess was had.)		5 not even a year prior, and they were -- where	
6 VIDEOGRAPHER: Okay. The time is		6 they -- they announced a tool where you can	
7 4:08. We're on the record continuing		7 use this feature called restrict to approve	
8 recording 4.		8 comments on a comment-by-comment basis.	
9 BY MR. BERRY:		9 Q. And Ms. Krasno also, in addition to	
10 Q. Did -- I want to wrap up a		10 commenting on university posts, she also	
11 conversation we were having before the break.		11 tagged the university in her own posts; is	
12 Would -- would it be fair to		12 that correct?	
13 characterize your testimony as you caring		13 A. Yes.	
14 about issues like racial equity and the		14 Q. Did -- had you received any complaints	
15 environment, but not having a strong opinion		15 about a post that Ms. Krasno tagged the	
16 on animal rights?		16 university in?	
17 A. That's correct.		17 A. Yeah. I believe it was	
18 Q. And -- and does that -- do you think		18 September 2020, sorry. I believe it was	
19 that your -- that your view about -- about the		19 September -- around September 2020 where	
20 importance of those issues affects your		20 Ms. Krasno had made a post complaining that	
21 moderation on those social media pages?		21 the university was untagging itself in -- in	
22 A. Not personally. I -- at all possible,		22 her Instagram post. And I saw that, you know,	
23 I try to remove personal, you know, opinions		23 because we were tagged in that post, and so I	
24 or biases in my official role.		24 stopped untagging the university.	
25 Q. Is it -- is it possible that even on a		25 Q. Okay. So prior to her complaining	

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1 about the tags being removed, were there any
 2 complaints that you received about -- about
 3 posts that she made where she tagged the
 4 university?

5 A. I don't recall any others.

6 Q. Do you recall any complaints
 7 from -- from anyone about any of Ms. Krasno's
 8 social media activity interactions with the
 9 university's social media?

**10 A. Again, I don't recall any. This
 11 was -- yeah, given the length of time ago,
 12 I -- I don't recall.**

13 Q. And as you testified earlier, if
 14 Ms. Krasno or any other user tagged the
 15 university in their own post, that would have
 16 appeared on a separate page for the
 17 university's Instagram account; is that
 18 correct?

19 A. Yes.

20 Q. And if -- and if the tags are removed,
 21 then those posts would no longer appear on the
 22 university's Instagram page; is that correct?

**23 A. Yes. That's correct. Although, the
 24 post still exists. You know, it is -- it is a
 25 different user's post.**

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1 you know, that pattern, I would -- I would
 2 restrict an Instagram account, like I did
 3 Ms. Krasno's. Monitor the comments, you know,
 4 in that period of restriction, see are they
 5 continuing to display the same behavior of
 6 making off-topic comments or comments that
 7 violate one of the criteria in the social
 8 media statement.

9 And -- and then, you know

**10 every -- maybe every month, couple months, not
 11 on a consistent basis. But, you know, after a
 12 period of time if, you know, maybe didn't hear
 13 from that user for a little while or they
 14 displayed behavior that was -- that didn't
 15 violate one of the criteria, it could be a
 16 number of things, I would unrestrict the
 17 accounts, just as like a fresh start.**

**18 As such I did with Ms. Krasno's
 19 account in late January, because around the
 20 same time that I just -- I kind of did
 21 that -- that inbox cleanse and just, yeah, I
 22 reviewed -- I reviewed many things within that
 23 time in late January.**

**24 Q. Prior to removing Ms. Krasno from the
 25 restricted account list, had you -- did you**

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**1 And I do want to clarify that if -- if
 2 a user's account is -- is like locked or
 3 private, and they tag, say, the university in
 4 a photo of theirs, I don't believe it
 5 will -- it will show up in the tagged section.**

6 Q. Thank you for the clarification.

7 You -- Ms. Krasno's account was
 8 un- -- was no longer restricted in January
 9 of 2021; correct?

10 A. Correct.

11 Q. And can you describe the decision
 12 to -- to loosen the restriction -- or to
 13 remove the restriction on Ms. Krasno's account
 14 in January of 2021?

**15 A. Sure. As I, you know, did with
 16 several other accounts on that kind of
 17 display, the same pattern of consistent
 18 off-topic comments or
 19 consistently -- consistently violating
 20 or -- or fitting one of the criteria in our
 21 social media statement for grounds for
 22 moderation, I used the Instagram tool
 23 to -- the Instagram restriction tool just to
 24 help with comment moderation. And I would,
 25 you know, run through. And if I had found,**

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1 have any concern about being sued over social
 2 media moderation of Ms. Krasno?

3 A. By Ms. Krasno specifically?

4 Q. Yeah. By Ms. Krasno specifically.

5 A. I -- no, I don't believe so.

6 Q. Did you have any concerns
 7 about -- about a lawsuit over the university's
 8 social media moderation other than by
 9 Ms. Krasno, by anybody?

10 A. Yeah. Generally, yes.

11 Q. Well, can you explain why -- why you
 12 had that concern?

**13 A. Yeah. So particularly over banning
 14 users. So this -- I don't recall, you know,
 15 when this conversation happened, but it was
 16 sometime after -- I know that there
 17 was -- there was a -- I don't know if it was a
 18 federal lawsuit or a lawsuit where -- where
 19 Donald Trump was sued as president for
 20 blocking users on Twitter. But I read that as
 21 social media in general, you know, blocking
 22 users.**

**23 And it was found to be -- I forgot the
 24 specific terms of -- of the verdict, but found
 25 to be that he couldn't block users on his**

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<p>1 social -- or on his Twitter account.</p> <p>2 And so that was -- that was certainly</p> <p>3 grounds for, you know, concern. You know, why</p> <p>4 that's -- why I would -- you know, yeah,</p> <p>5 display concern for, you know, sometimes</p> <p>6 university employees will come to me asking</p> <p>7 for advice about how to handle a specific</p> <p>8 instance or user or comment or what have you.</p> <p>9 And in -- in, you know, so many</p> <p>10 different ways, I might say, like, don't ban</p> <p>11 you -- you know, might be able to moderate the</p> <p>12 comment this way depending on the</p> <p>13 circumstances at hand.</p> <p>14 But generally speaking, yeah, blocking</p> <p>15 accounts -- an account level block ban was</p> <p>16 something that was on my radar as something</p> <p>17 that, you know, wouldn't be allowed. Sorry.</p> <p>18 I'm getting hoarse.</p> <p>19 Q. Getting towards the end of the day.</p> <p>20 Sorry.</p> <p>21 A. It's okay.</p> <p>22 Q. In the course of Ms. Krasno</p> <p>23 posting -- well, actually, let me take that</p> <p>24 back.</p> <p>25 Prior to removing the restrictions on</p>	<p>181</p> <p>1 something about lifting the veil on the</p> <p>2 section in her -- in her time working in the</p> <p>3 UW primate lab.</p> <p>4 And so I, you know, since it involved</p> <p>5 the primate lab, I -- I sent it to our -- some</p> <p>6 of our research communicators, just as a</p> <p>7 heads-up. And our research communicators</p> <p>8 in -- are still university communications.</p> <p>9 But I would consider them subject</p> <p>10 matter experts or beat writers is another way</p> <p>11 that I would describe them. Particularly one</p> <p>12 employee who handles -- or covers the topic of</p> <p>13 animal research as it relates to research</p> <p>14 communications.</p> <p>15 Q. And what was that -- what was that</p> <p>16 particular employee's name?</p> <p>17 A. Chris Barncard.</p> <p>18 Q. And what -- can you explain how -- how</p> <p>19 notifying -- Chris Barncard or</p> <p>20 anyone -- anyone else relating to the animal</p> <p>21 research subject matters at the university</p> <p>22 relates to your -- to your job description as</p> <p>23 a social media manager?</p> <p>24 A. Yeah. So social listening. That</p> <p>25 means monitoring, whether it is content</p>
<p>1 Ms. Krasno's account in January 2021, had</p> <p>2 you -- had you spoken with anyone or heard</p> <p>3 from anyone at the university expressing</p> <p>4 concern about her -- Ms. Krasno's critical</p> <p>5 comments?</p> <p>6 MR. KILPATRICK: I'm going to object</p> <p>7 to the extent it calls for communication with</p> <p>8 UW legal counsel, and direct the deponent not</p> <p>9 to answer and expose those communications.</p> <p>10 BY MR. BERRY:</p> <p>11 Q. So answer the question, then, except</p> <p>12 with regards to legal counsel.</p> <p>13 A. Would you be able to repeat the</p> <p>14 question, please?</p> <p>15 Q. Yeah. Other than communications with</p> <p>16 legal counsel, did -- did you speak with</p> <p>17 anyone who worked for the university who --</p> <p>18 who expressed concern to you about</p> <p>19 Ms. Krasno's comments on the university's</p> <p>20 social media pages?</p> <p>21 A. I recall -- let's see. I recall there</p> <p>22 was a conversation we had where one of us saw</p> <p>23 that there was -- there was an event by a host</p> <p>24 and Ms. Krasno was the guest speaker. And I</p> <p>25 saw, like, the event description, I think</p>	<p>182</p> <p>1 created by the university or if it's about the</p> <p>2 university. I believe that fits my job</p> <p>3 description to, you know, listen or, you know,</p> <p>4 social listening, which means using your eyes</p> <p>5 to read.</p> <p>6 But as it relates to my job</p> <p>7 description, I, you know, I need to monitor,</p> <p>8 you know, how folks are talking about the</p> <p>9 university or, you know, media mentions</p> <p>10 or -- or what have you, and share it with</p> <p>11 various communicators as it relates to their</p> <p>12 field.</p> <p>13 Q. How often are you -- are you relating</p> <p>14 things that you -- that you listen to other</p> <p>15 people in the university?</p> <p>16 A. I would say almost on a daily basis.</p> <p>17 Q. And can you give a list of examples</p> <p>18 of -- of things that you've -- that you've</p> <p>19 relayed to other people in the university that</p> <p>20 you've seen on social media?</p> <p>21 A. Sure. So quite recently with</p> <p>22 the -- the Russia-Ukraine conflict, there's an</p> <p>23 office, it's CREECA, C-R-E-E-C-A, I forget</p> <p>24 exactly what the acronym stands for, but kind</p> <p>25 of like centrally European-Russian studies. I</p>

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1 think that's the -- part of the focus of that 2 department. 3 They were hosting a series of events 4 about Ukraine and whatnot. And I just sent as 5 a heads-up to several, you know, colleagues 6 that the event was happening, just because 7 the -- the topic in the news was so fresh.		1 on -- on the university relation's website. 2 There are -- you know, a laundry list of, you 3 know, suggests to be timely and be responsible 4 in your communications and, you know, to not 5 represent the university in your, you know 6 work capacity or to make sure your -- you're a 7 good representative of the university.		
8 Other times we might get a -- a big 9 social media mention or a mention or -- or are 10 the topic of a social media post by a -- an 11 account with a large following, which is 12 generally not worthy.		8 Q. Do you -- how does that, protecting 9 the university's reputation, relate to how you 10 see your job function at the university?		
13 So I might, you know, send a heads-up, 14 a, hey, we might be -- we might see more 15 traffic on this outside of social media.		11 A. I -- I see my role as, you know, one 12 of -- one of many -- but one of the essential 13 parts of the university's reputation so far as 14 I'm the main representative for the 15 university, and the main institutional 16 accounts on social media.		
16 I'll usually send a heads-up to other 17 social managers if, like we discussed before, 18 PETA or, you know, an animal-related account 19 will be running a campaign. There -- because 20 there are, you know, various aspects involved 21 with that outside of social media.		17 Q. Okay. Do you -- do you ever talk with 18 people involved in -- in, like, development or 19 fundraising or anything with the university?		
22 So I'll usually notify Chris and/or 23 Kelly, Kelly Tyrrell, who is the research 24 communications director for the university 25 communications, and Chris reports to Kelly.		20 A. Sorry. Can -- I -- I missed a word 21 you said in there.		
1 Those are a few examples. 2 Q. Do you have any sense of why it 3 matters what people are saying? Excuse me. 4 Let me rephrase the question. 5 Why does it matter to the -- what 6 people are saying about the university on 7 social media? 8 A. I work in the communications office 9 and -- and so we handle almost -- well, a 10 majority of the incoming and outgoing 11 messaging. But, you know, social media is 12 just one facet of -- of, you know, the media 13 landscape. 14 Oftentimes we'll receive emails, 15 calls, other forms of contact. And so it's 16 just important to keep a finger on the pulse 17 of, you know, any given topic. And, you know, 18 what's -- what's new or noteworthy or might 19 need to, you know, check with subject matter 20 experts on. 21 Q. Does the -- does the university's 22 reputation matter to the communications 23 department? 24 A. Yes. And particularly in the social 25 media guidelines in the university relations	186	22 Q. Oh, yeah. Do you -- do your job 23 duties involve ever talking with employees 24 involved in fundraising for the university as 25 it might relate to social media?	188	1 A. Yes. 2 Q. And have any of those conversations 3 with university employees involved in 4 fundraising ever ventured to the topic of 5 animal research? 6 A. I -- I believe so. 7 Q. Can you -- can you describe the nature 8 of those conversations? 9 A. Yeah. I'm thinking of particularly, 10 you know, questions that might come my way in 11 regards to comments on a -- different 12 university offices, social media accounts that 13 are related to animal research. And they have 14 questions, you know, about those comments so 15 they come to me. 16 Q. What kind of comments would they have 17 questions about? 18 A. Oh, comments that might involve animal 19 research. 20 Q. Can you give an example? 21 A. I can't quote any verbatim. I -- I 22 don't recall specific comments. 23 Q. Okay. And would this be by an email, 24 Teams message? Like how would these -- how 25 would questions about these comments be

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1 related to you?		1 university?	
2 A. Could be either.		2 A. All the time. I mean, there	
3 Q. Okay. And do the comments ever relate		3 are -- this is a large university, and we have	
4 to Ms. Krasno?		4 many events happening every day, many of which	
5 A. I don't recall if they specifically		5 are promoted on social media.	
6 mention Ms. Krasno or not.		6 Q. And previously you testified that --	
7 MR. BERRY: Can we mark UW0026 as		7 that you'll share these types of events that	
8 the -- our next exhibit, put that on the		8 people -- who they pertain to.	
9 screen?		9 But can you explain why -- why Kelly	
10 (Whereupon, Moll Deposition		10 thought to inform you about it?	
11 Exhibit No. 36 was marked		11 MR. KILPATRICK: Objection; calls for	
12 for identification.)		12 speculation.	
13 TECHNICIAN: 36.		13 BY MR. BERRY:	
14 BY MR. BERRY:		14 Q. Do you have any idea why -- why Kelly	
15 Q. Just take a moment to review that.		15 thought you should know about this?	
16 Maybe scroll down to the bottom of the page,		16 A. I can't answer for Kelly. But I -- I	
17 too.		17 see in the event description that it mentions	
18 Are you familiar with this document?		18 University of Wisconsin Madison and social	
19 A. Yes, I am.		19 media.	
20 Q. And what is this document, Exhibit 36?		20 Q. What kind of monitoring would you do	
21 A. Sure. Would you be able to scroll		21 with regards to this event as part of your job	
22 back up to the top, please or at least include		22 duties?	
23 more of it?		23 A. All right. Let me -- can I read the	
24 Yeah, that's great. Thank you.		24 event description here?	
25 This is an email regarding a social		25 Q. Sure.	
	190		192
1 media workshop, either lead or including		1 A. So monitoring would include, you know,	
2 Ms. Krasno.		2 listening for -- or in the event description	
3 Q. And --		3 it describes, you know, using social media as	
4 A. Cohosting.		4 part of our campaigns.	
5 Q. -- how often do you receive emails		5 And specifically in the first line	
6 like this, about other people having events?		6 under the first ellipses, we can still	
7 A. How often do I receive emails about		7 pressure labs to stop torturing animals.	
8 events?		8 And we have seen campaigns like that	
9 Q. Yeah. About events like this?		9 in the past on social media. So I believe	
10 A. Events like the one that Ms. Krasno		10 that's -- that's relevant to my line of work,	
11 was involved in?		11 to monitor.	
12 Q. Let me -- well, let me		12 Q. Other than generally being aware of	
13 scratch -- scratch that.		13 the events happening, is there any other kind	
14 Do you see at the top of this email		14 of monitoring activity that -- that you did	
15 exchange it says that the sender is [as read]:		15 with regards to this event?	
16 "I'm copying Nate Moll who		16 A. This event specifically, I don't	
17 runs a number of our		17 believe so.	
18 institutional accounts and		18 Q. Other than generally being aware that	
19 also helps us monitor and		19 events are occurring, what kinds of monitoring	
20 respond to campaigns."		20 activities would you go -- would you engage	
21 Is that an accurate...		21 in, had you engaged in -- I can -- I can	
22 A. That's accurate.		22 rephrase that so it's clear.	
23 Q. Yeah. How -- how often are you -- are		23 What other monitoring activities have	
24 you monitoring events that -- that other		24 you engaged in for events that go beyond just	
25 people are hosting that might relate to the		25 being aware that the events are occurring?	

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1 A. Depending on the event, I'll provide 2 event coverage or, you know, run replies from 3 our accounts. Excuse me. Or -- or interact 4 with -- with social media posts from an event. 5 Q. What do you mean by "event coverage"? 6 A. Sure. If I were to staff an event, 7 say a Badger football game, I, you know, will 8 staff the event in person and produce content 9 indirect with fans on social media or if this 10 were a chancellor speaking event, I might, you 11 know, in a similar fashion, produce content 12 for either the chancellor, you know, 13 recommended content for the chancellor or 14 primarily work through the UW-Madison social 15 channels to provide event coverage by 16 producing content or looking for content 17 produced by others, you know, that might 18 mention or be about the university in relation 19 to that event.		1 and -- and campus utilities. 2 Q. With regards to moderating 3 Ms. Krasno's comments, the -- are there any 4 reasons, other than them being off topic, that 5 you've ever moderated her -- her account or 6 her comments on the university's social media 7 pages?	
20 Q. Have you ever staffed any of 21 Ms. Krasno's events? 22 A. No, I have not. 23 Q. Have you ever -- have you ever staffed 24 any -- any events relating to animal research? 25 A. We did have -- this was a UW police		8 A. If -- I can't say for sure, but 9 generally speaking, you know, I did notice a 10 pattern of behavior of making off-topic 11 comments. I can't say that every comment that 12 was moderated would fit into that off-topic 13 criteria. There may be others, but generally 14 speaking, that is the pattern I noticed of 15 being off topic.	
194		16 Q. Earlier we had -- let's see here. 17 Sorry. Just give me a second here. 18 MR. BERRY: Can we pull -- actually, 19 let's pull up Exhibit 20 again. 20 You know, actually, I wanted -- I 21 wanted 21. Sorry about that. Could we put 22 Exhibit 21 back up? 23 Can we scroll down to the bottom of 24 that? 25	196
1 department -- it was like a tabletop exercise 2 as part of the American C [sic] Operations 3 Center or EOC [sic]. 4 And so as -- as part of my role, I 5 also hold a social media position within this 6 EOC organizational structure in a role very 7 similar to my -- my current role in university 8 communications. 9 And we did have a tabletop exercise 10 that involved animal research where we -- we 11 lost power at a campus -- or a part of campus 12 involving a research lab and needed to, you 13 know, go through the simulation as a training, 14 how to handle that -- that scenario. And 15 that -- that EWP scenario involved animal 16 research in -- in that way, in that 17 hypothetical scenario. 18 Q. Was the -- was the emergency just 19 related to securing the animals or was 20 it -- was there like a -- was there like a 21 criminal component to the -- to the exercise? 22 A. No, I -- I think it was a -- like a 23 storm scenario where like a -- either a storm 24 or a tornado ripped through campus and lost 25 power to, you know, various buildings		1 BY MR. BERRY: 2 Q. This is the -- the interim guidelines 3 that we talked about from May 2021. And it 4 says at the bottom there as we discussed that 5 [as read]: 6 "To the extent users post 7 on-topic content that is 8 inaccurate, misleading or 9 critical of University of 10 Wisconsin Madison, social 11 media managers may respond 12 either with a reply or a 13 separate post." 14 Do you remember that, and go on to 15 that -- the part of the -- the interim 16 guidance? 17 A. Yes, I do. 18 Q. Is -- is there any -- -- is it your 19 view that Ms. Krasno -- that her content is 20 inaccurate, misleading or critical? 21 A. I would consider it critical. As for 22 inaccurate or misleading, I -- I would need to 23 do more research or consult a subject matter 24 expert. 25 Q. Have you ever -- have you ever	

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1	moderated a comment from -- from Ms. Krasno	1	BY MR. BERRY:
2	because you thought it was inaccurate,	2	Q. And are you familiar with this
3	misleading, or critical?	3	document, which is exhibit -- actually, if
4	A. There may have been a situation like	4	you -- is this 37 that we're on?
5	that. I -- I can't recall a specific	5	A. I'm familiar with that.
6	instance, but it may have happened.	6	Q. Okay, yeah. Yeah. For Exhibit 37
7	Q. And have you ever -- have you	7	here, can you -- do you recognize this
8	ever -- have you ever replied or -- or	8	document?
9	responded to Ms. Krasno for any -- any content	9	A. Yes, I do.
10	based on it being inaccurate, misleading, or	10	Q. And what is it?
11	critical?	11	A. This is a screenshot of UW-Madison's
12	A. I don't recall any specific replies or	12	Instagram privacy and security settings as
13	responses, but again, it -- it may have	13	they relate to comment filtering with the list
14	happened at some point.	14	of keyword filters.
15	MR. BERRY: We can -- we can put the	15	Q. Okay. And there are a number of words
16	exhibit down.	16	here, including a few that are profanity. But
17	BY MR. BERRY:	17	17 would you -- would you agree that -- that many
18	Q. Earlier I had asked if you had staffed	18	18 of the words, such as animal testing, testing
19	any of Ms. Krasno's events. Do you know if	19	19 cats, testing on animals, torture,
20	anyone from the university has ever staffed	20	20 vivisection, W-N-P-R-C, for example, are --
21	any of her events?	21	21 are not profanity?
22	A. Not that I'm aware of.	22	A. I would not consider those profanity,
23	Q. Okay.	23	no.
24	MR. BERRY: I hate to do this, but can	24	Q. So can you explain that -- why -- why
25	we actually bring Exhibit 21 back up? I	25	25 those words would be in the auto-moderation
	198		200
1	didn't realize it would be the next one.	1	list, despite not being profanity?
2	BY MR. BERRY:	2	A. The -- these words or phrases were
3	Q. On -- on Exhibit 21 here there's a	3	likely added for -- in relation to those types
4	section heading, auto moderation. And it says	4	of spam campaigns that I've described several
5	[as read]:	5	times where they can completely inundate and
6	"Social media managers may	6	overwhelm me or a social media manager.
7	use platform and/or	7	And so if they see a -- a commonly
8	computer-based tools to	8	repeated word or phrase within those spam
9	auto moderate the use of	9	campaign comments, they will -- and -- and
10	profanity. Social media	10	11 need to -- you know, require the use of the
11	managers are using auto	11	12 auto moderator for help in just content
12	moderation tools to filter	12	13 management, I will add that order phrase to
13	content other than	13	this list.
14	profanity. Please have	14	Q. Is that -- to the best of your
15	them contact Rachel Jeris	15	knowledge, are -- are these words still --
16	or Craig Fischer in OLA."	16	still on the list, or has the list changed
17	Do you acknowledge that's what the	17	since this document was produced?
18	exhibit says?	18	A. I haven't looked at the list recently.
19	A. Yes, it does.	19	I don't recall. I don't know when this
20	Q. And can we -- can we now go to -- add	20	screenshot was taken.
21	a new exhibit? This will be file UW0145.	21	Q. Do you remember -- do you remember
22	(Whereupon, Moll Deposition	22	making any significant modifications to the
23	Exhibit No. 37 was marked	23	keyword filters, I guess at any time since the
24	for identification.)	24	lawsuit was filed?
25		25	A. Oh, since the lawsuit. I don't recall

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1 specific instances of -- of removing words 2 there -- there may have been words that 3 removed, or words or phrases. 4 But I don't keep any documentation 5 outside of an example of what you're seeing 6 here. 7 The only list of words that exists -- 8 words or phrases that exist is within the 9 Instagram or Facebook settings themselves.		1 I don't anticipate this will be a lot longer, 2 maybe -- maybe 20 minutes or so. 3 Can we pull up Exhibit -- I think it 4 was 37? This is the Instagram keyword filter. 5 BY MR. BERRY: 6 Q. With regards to Exhibit 37 here, 7 Mr. Moll, I -- -- several of these comments 8 relate to -- just to animals or animal 9 research-related terms? 10 Would you agree with that?	
10 Q. Did you ever discuss 11 these -- these -- sorry. 12 With -- without describing the content 13 of any of these conversations that may have 14 occurred, did you ever -- did you ever discuss 15 the keyword auto moderator filters for the 16 social media accounts with Ms. Jeris or 17 Mr. Fischer as -- as prompted by the interim 18 social media guidelines?		11 A. Yes. 12 Q. And, you know, it's also a relatively 13 short list. I mean, we could count them up. 14 But it looks like there's maybe a dozen or two 15 words total. 16 I was wondering if you could explain 17 why -- why so much of this comment filtering 18 list are -- are terms relating to animals and 19 animal research?	
19 A. As there is guidance in the 20 interim -- in the interim guidance, it -- it 21 was probably covered in our conversations. I 22 don't recall specific conversations or the 23 contents. 24 Q. Okay. I got -- you know, just -- 25 MR. BERRY: How do people feel about,		20 A. Sure. I'd say that the fast majority 21 of the spam-style campaigns that we receive 22 are related to animal testing. And that's 23 typically where I require the -- the 24 assistance of the auto moderator to handle 25 those types of comments, you know, where they	
1 like a five-minute break, and then resuming 2 what I anticipate to be a fairly short 3 completion? 4 I know it's -- it's 5:00, and I don't 5 want to drag this out too long. But would it 6 be okay just to break for -- for five minutes 7 and come back for a little bit more? 8 MR. KILPATRICK: That's fine with me. 9 THE WITNESS: That's fine. 10 MR. BERRY: Okay. 11 VIDEOGRAPHER: And we're going off the 12 record. The time is 4:59. 13 (A short recess was had.) 14 VIDEOGRAPHER: The time is 5:06. 15 We're on the record at the start of recording 16 5. 17 MR. KILPATRICK: I just got something 18 quick. 19 MR. BERRY: Mm-hmm. 20 MR. KILPATRICK: Craig Fischer, he had 21 to leave and drop off the call. And Rachel 22 Jeris has come in the call in his place. You 23 may recognize that name. She's with the UW 24 office, legal counsel. 25 MR. BERRY: Sounds good. Thanks. And	202	1 have a, you know, consistently using a keyword 2 or phrase. 3 Q. Okay. So it's a -- so this -- okay. 4 Do -- do other -- other topics 5 generate a lot of comments as well, other than 6 animal research? 7 A. Topics... 8 Q. Sorry. Would you say -- are there 9 other -- are there other -- other issues that 10 generate a large number of off-topic comments, 11 besides animals used in research? 12 A. There have been in the past, but not 13 with the -- the frequency as animal research 14 campaigns do. 15 Q. You said -- okay. 16 MR. BERRY: Can we -- can we go to 17 file UW0144, which actually, I believe this is 18 the accidentally -- I had accidentally 19 designated this as Exhibit 27, I think. 20 Somewhere -- somewhere in that area. Did I 21 actually get that right? 22 Is that Exhibit 27? 23 TECHNICIAN: Yes, sir. 24 MR. BERRY: Oh, good. No business 25 remembering that exactly, but, great.	204

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	205		207
1 BY MR. BERRY:		1 Q. And, for example, on the third line of	
2 Q. Mr. Moll, can you describe what this		2 the blocked keywords there's one phrase of	
3 Exhibit 27 is?		3 'blue lives matter.'	
4 A. Yes. This is a screenshot of the		4 Do you see that phrase? It's been	
5 UW-Madison Facebook page settings. And the		5 added to the moderator.	
6 settings relate to page moderation where it		6 A. Yes, I do.	
7 contains a list of words or phrases on the		7 Q. Do you remember -- do you remember the	
8 auto moderated list.		8 circumstances that led you to add -- add that	
9 Q. And can we -- and are -- are you		9 phrase to the list?	
10 familiar with this -- with this page and these		10 A. Generally, yes.	
11 settings shown on Exhibit 27?		11 Q. And in general, what can you -- can	
12 A. Yes, I am.		12 you sort of describe the -- the circumstances	
13 MR. BERRY: Can we zoom in a little		13 behind adding blue lives matter to the list of	
14 bit, actually?		14 moderated words?	
15 BY MR. BERRY:		15 A. Yeah. There was a -- an issue related	
16 Q. And so what happens when a comment		16 to -- let's see. Gosh, sorry.	
17 contains one of these words made to the		17 There was a photo taken in our	
18 university's Facebook posts?		18 university police department with various, you	
19 A. If a comment containing one of these		19 know, police officers and university PD staff.	
20 words or phrases is made on a UW-Madison		20 And that photo contained, I believe it was a	
21 Facebook post, it's similar to Instagram		21 wall hanging or a wall decoration with, it's a	
22 hidden from -- you know, the comment is		22 stylized American flag with one blue stripe	
23 hidden. It's still visible to the user and		23 as, you know, to -- to signify, you know, like	
24 any friends -- Facebook friends of -- of that		24 a police officer if you're familiar with	
25 commentor.		25 that -- that emblem.	
	206		208
1 Q. Okay. And -- and do you manage the		1 And we received many, many comments on	
2 words that appear on this list?		2 a wide array of Facebook posts that included	
3 A. I am the point person, yes, for this		3 the blue lives matter phrase.	
4 list.		4 Q. Were the --	
5 Q. And did you add any of the words		5 (Indiscernible simultaneous	
6 relating to animals and research that appear		6 colloquy.)	
7 on this list?		7 BY MR. BERRY:	
8 A. I would -- I would assume that I did,		8 Q. Finish.	
9 yes, add some of these words or phrases		9 A. Yeah. To the point where I -- I	
10 relating to animals.		10 required the assistance of the auto moderator	
11 Q. Are you -- are you aware of any other		11 to help handle those comments.	
12 words that -- that have been added to this		12 Q. And were those comments, you know, in	
13 list, subsequently to the creation of this		13 favor of blue lives matter or in opposition to	
14 document?		14 the -- to that statement or otherwise?	
15 A. No, I'm not.		15 A. I -- I don't know if I could say for	
16 Q. And does the grouping of the word say		16 sure.	
17 anything about when they were added?		17 Q. Okay.	
18 For example, are the ones -- are the		18 A. There were many, many comments. So I	
19 ones at the top the most recently or -- or		19 can't group them all as one.	
20 added or -- or the oldest ones, alternatively?		20 Q. And in -- were those blue lives matter	
21 Is there any -- is there any sort of logic to		21 comments appearing on posts other than the	
22 the order that they appear?		22 police department post?	
23 A. I don't believe so. Just by looking		23 A. Were -- sorry. Could you rephrase	
24 at some of these, I don't think there's any		24 that?	
25 logic to the organization of these.		25 Q. Yeah. You -- you said that there	

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	209		211
1	was -- there was a picture, right, from the	1	would add black lives matter, if it became a
2	police department that was -- that had college	2	word -- a phrase that was being used
3	people to start saying that?	3	frequently off topic on social media posts?
4	A. Oh, yeah. That photo of the police	4	A. It's possible. But I do want to point
5	department was not shared by the UW-- at	5	out that there are other reasons or criteria
6	UW-Madison accounts. It was -- it was from a	6	beyond being on or off topic for -- for which
7	different source.	7	a word or phrase can be added to this list.
8	Q. Okay. Have you ever -- have you ever	8	Q. That's a -- yeah, I understand that.
9	moderated a word -- words or phrases	9	But I just want to be clear that that is your
10	associated with -- with like -- with	10	view that black lives matter could be added to
11	racial diversity or racial inclusion?	11	the auto-moderation keyword filter if -- if a
12	STENOGRAPHER: I'm sorry. What was	12	lot of people were using that phrase in an
13	it?	13	off-topic way on soc -- on the university's
14	BY MR. BERRY:	14	social media post; is that correct?
15	Q. In support of racial adversity or --	15	A. It -- it could, yes.
16	or racial equity?	16	Q. Okay. Have you ever considered doing
17	A. Have I ever moderated a word relating	17	that?
18	to racial diversity or equity?	18	A. I don't recall any considerations.
19	Q. Yeah.	19	Although, they could have occurred at some
20	A. I'm not sure I understand the scope of	20	point in time.
21	the question. It -- it's possible. I'm not	21	Q. Is that -- is that a phrase that is
22	sure.	22	often used off topic on social media posts for
23	Q. Okay. Do you -- looking at this list	23	the university?
24	in front of you, do you see any terms that	24	A. I'm not sure we have received a lot of
25	are -- any terms or phrases that are -- that	25	comments, and I -- I'm not sure.
	210		212
1	are related to -- to, you know, promoting	1	Q. And you said you've been the social
2	diversity, equity, and inclusion?	2	media specialist or manager since 2013?
3	A. I see a phrase "all lives matter." I	3	A. Correct, July 2013.
4	also see "China virus" and "Chinese virus."	4	Q. And you don't -- you don't remember a
5	Q. Can you say those phrases are -- are	5	time where -- where people would be posting
6	promote -- promote diversity, equity, and	6	black lives matter, for example, on -- on
7	inclusion?	7	this -- off-topic social media posts by
8	A. Those phrases alone, I -- it's tough	8	university?
9	to determine based on just those phrases	9	A. Well, we -- we have -- and the
10	alone.	10	university has posted about the black lives
11	Q. Okay. So they might be related to	11	matter movement on social media as, you know,
12	promoting diversity, equity, and inclusion,	12	event coverage and -- and support for our
13	you don't know?	13	diversity, equity, and inclusion initiatives.
14	A. They -- they might. It's -- it's	14	So at -- I would say that typically we
15	context dependent.	15	would not add a word or phrase to an auto
16	Q. Okay. Would it -- would it be your	16	moderated list for topics that we do post
17	position that it would be appropriate to add,	17	about on our Facebook and Instagram accounts.
18	for example, black lives matter to this list	18	There may certainly be caveats to that, as I
19	if that -- if that was a phrase that was	19	do use the auto moderator tool to assist
20	commonly being used off topic?	20	with -- with handling, you know, volumes of
21	A. If it was a phrase being used very	21	21 comments.
22	often, and the comments were off topic, there	22	But typically speaking, we -- I stick
23	could be grounds to adding it.	23	23 to words or phrases that we would not cover
24	Q. So potent- -- so you're -- so what	24	24 within the scope of the UW-Madison Facebook
25	you're testifying is that potentially you	25	25 and Instagram accounts.

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	213		215
1 Q. Does the university social media		1 MR. BERRY: Can we -- this might be my	
2 account ever -- ever post about research that		2 last topic here. Can we go to designate	
3 the university is doing that -- that relies on		3 UW0695? And that would be -- I think it's the	
4 animal research?		4 Exhibit 38 that we're on now. But let	
5 A. It's -- it's possible, yes.		5 me -- maybe if you could just let's us know	
6 Q. So that being the case, would		6 what that -- what the exhibit is or -- or show	
7 that -- would that render comments about		7 it when it comes up.	
8 animal research to be on topic in general,		8 TECHNICIAN: You're correct again,	
9 then, be -- if there were some posts relating		9 sir. Exhibit 38.	
10 to -- to research that the university		10 (Whereupon, Moll Deposition	
11 was -- was doing that involved animal		11 Exhibit No. 38 was marked	
12 research?		12 for identification.)	
13 A. If that specific post by the		13 BY MR. BERRY:	
14 university was about animal research, then a		14 Q. And do you recognize this post?	
15 comment involving animal research would be on		15 A. Yes. This is a screenshot of a	
16 topic.		16 Microsoft Teams chat thread with the social	
17 Q. Okay. So it's still -- it's -- the		17 media managing team.	
18 comment has -- hasn't pertained to the		18 Q. Okay. And can you describe	
19 specific post any -- even if a subject is		19 what -- what the conversation is about in this	
20 frequently posted about the comment still has		20 Exhibit 38?	
21 to pertain to that specific post?		21 A. This jumps into -- or this	
22 A. Correct. In -- in determining whether		22 is -- appears to be the middle of a	
23 it's on or off topic. But there -- there are		23 conversation. Let's see. But this is a	
24 other criteria that I take into consideration.		24 conversation about comments on an Instagram	
25 Q. Well, are there ever times where an		25 post.	
	214		216
1 off-topic comment can -- that you would keep		1 Q. And those comments are -- are relating	
2 an off-topic comment on -- on a post, even		2 to a -- to Cornelias; is that correct?	
3 though it is off topic?		3 A. Yes.	
4 A. Yes. Whether I -- you know, might not		4 Q. What is -- what is Cornelias, and why	
5 see it, it's -- you know, maybe sometimes		5 is that being -- why is that being discussed?	
6 made, you know, after the fact.		6 A. Cornelias is the -- the name of one of	
7 Yeah, it's oftentimes circumstantial		7 the primates involved with research at the	
8 of, you know, the workload of myself or		8 university.	
9 whoever is moderating comments at the time as,		9 Q. And you said that you added it to the	
10 you know, social media is -- it never sleeps.		10 auto moderator?	
11 The office doesn't close at 5:00 p.m.		11 A. Yes, I believe. Yeah, I said that, or	
12 or the accounts don't close at 5:00 p.m. like		12 it was a -- yeah.	
13 offices sometimes do. You know, social media		13 Q. And why -- why did you add that	
14 posts are living documents.		14 Cornelias to the auto moderator?	
15 Q. So except for situations where		15 A. A -- based on this conversation, it	
16 somebody doesn't notice a comment or		16 appears that we were receiving many comments	
17 does -- you know, doesn't have time to address		17 relating to Cornelias on a commencement video,	
18 it, are there other reasons where you would		18 and -- and a comment -- and if I -- if I	
19 notice a comment that's off topic and decide		19 recall correctly for that campaign, there were	
20 to keep it anyways?		20 comments to release Cornelias. And a comment	
21 A. I'm sure there are. I -- I can't put		21 just stating release Cornelias would be off	
22 my finger on any specific reasons.		22 topic on a commencement video.	
23 Q. Would that just be up to the		23 Q. Do you -- so you said in this thread	
24 discretion of the moderator, then?		24 that you added Cornelias to the auto	
25 A. Yes.		25 moderator.	

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	217		219
1 Do you recall a time where you ever 2 went through those auto moderated comments to 3 decide whether to -- to unhide ones 4 that -- that happen to be on topic for future 5 posts?		1 the one to add that laughing emoji to that 2 comment?	
6 A. Sorry. Could you restate the 7 question?		3 A. I don't recall if I added a laughing 4 emoji to that.	
8 Q. Yeah. Were there any instance where 9 you reviewed posts that were hidden for having 10 Cornelias to determine whether to unhide those 11 terms -- those comments?		5 Q. So it -- do you -- is there any reason 6 that that -- that you find that funny?	
12 A. Oh, I see. Yes, you know, I will 13 review the hidden comments caught by the auto 14 moderator to see if it's working as intended 15 to catch those spam-style comments that have 16 nothing to do with, in this case, a 17 commencement video.		7 MR. KILPATRICK: Objection; 8 mischaracterizes the testimony of the 9 deponent.	
18 But, yeah, I do check especially for, 19 you know, recently added words or phrases to 20 make sure that they are working as intended, 21 that they're only catching those that I can 22 determine in a bulk sense.		10 BY MR. BERRY: 11 Q. You can answer the question.	
23 So I look for keywords or phrases that 24 are repeated over and over and over to add to 25 the auto-moderated list.		12 A. I don't know why that would be funny. 13 We're just talking about a -- another -- or 14 a -- yeah, another spelling of -- of a -- of a 15 name.	
218		16 Q. So would you -- would you be surprised 17 if I told you that you were the one who put 18 that smiling emoji there?	
1 Q. Do you remember any specific instance 2 where you -- were you actually did unhide a 3 comment that had -- that had Cornelias in it?		19 A. I -- I don't recall that -- ever doing 20 it. I -- I'm in the conversation, but, yeah, 21 I'm not sure.	
4 A. I don't recall a specific one.		22 Q. But would you be surprised if I told 23 you that you were the one who put that smiling 24 emoji to that comment?	
5 Although, it may have happened before.		25 A. I don't know if I would be surprised.	
6 Q. So it might have happened, but you 7 don't have any specific memory of it ever 8 happening?		220	
9 A. Not a specific memory.		1 Q. Okay. So you're -- so you're saying 2 you don't know -- you wouldn't be surprised if 3 you had put the smiling emoji, but you also 4 don't know why that would be funny?	
10 Q. Do you have a vague or a general 11 memory of having unhidden -- the Cornelias 12 comment?		5 A. Well, and -- and I can't speak for the 6 person who made that -- another variant in the 7 spelling, variant spelling of Cornelias.	
13 A. No. I -- I don't remember.		8 I'm also not sure what time of year 9 this conversation took place. But	
14 Q. And I also see some -- someone had 15 posted another variant Corneliois that's at 16 the bottom there. Do you see that?		10 as -- as -- so in -- in the social media group 11 chat if you will, we, you know, have -- had 12 been dealing with many stressful situations 13 with, you know, more and more variants 14 and -- and just COVID variants and how they 15 related to university operations and, you 16 know, continuing the pandemic.	
17 A. Yes.		17 And so I guess in -- in, yeah, I can 18 see how this comment, you know, another 19 variant. You know, as more and more variants 20 were popping up in, you know, the news and as 21 they affected all of us, you know, it -- it --	
18 Q. And there -- there was a laughing 19 emoji. Can you -- can you explain what 20 the -- I don't know what -- why someone would 21 have found that comment funny?		22 I might have found that funny at the time just 23 in the way it was phrased, focusing on -- on 24 another variant. But I -- that's -- I -- I'm	
22 MR. KILPATRICK: Objection; 23 speculative.		25 not sure.	
24 BY MR. BERRY:			
25 Q. Did you -- did -- did you -- were you			

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1 Q. Okay. We -- I --		1 And so given the circumstance where	
2 MR. BERRY: I guess this would be		2 we're being completely inundated by comments	
3 maybe more for Steven. We might -- we		3 within our Instagram account for this -- this	
4 might -- I might request the -- I'm sure		4 Cornelias campaign which is, to be quite	
5 there's a way to figure out who did that		5 honest, very stressful, personally speaking.	
6 smiley, so just a heads-up. But we		6 And so this -- this comment on -- in	
7 would -- if we do, if we could get -- if we		7 particular, "release the Cornelias," you know,	
8 can, would you get a request for that?		8 I immediately see flowers in my mind.	
9 MR. KILPATRICK: Okay. Noted.		9 And given the stressful circumstance,	
10 MR. BERRY: It's just for preservation		10 you just need to take a quick step back and,	
11 purposes that I mention that.		11 you know, remind yourself that -- to breathe	
12 Can we pull up -- let's see -- can we		12 and -- and that, you know, I think this was	
13 do -- can we pull up and designate as		13 just the same moment of finding a -- a spark	
14 exhibit -- UW0703?		14 of a smile in what was otherwise a very	
15 (Whereupon, Moll Deposition		15 stressful point in time.	
16 Exhibit No. 39 was marked		16 Q. Okay. Do you have -- we can -- we	
17 for identification.)		17 don't need that exhibit anymore.	
18 BY MR. BERRY:		18 Do you -- I mean, what -- what are	
19 Q. And are you familiar with this		19 your personal feelings on the -- on that	
20 document?		20 Cornelius campaign?	
21 A. Yes, I am.		21 A. The campaign in general?	
22 Q. Can you describe it?		22 Q. Yeah.	
23 A. This is a screenshot of a Microsoft		23 A. I -- I don't -- I mean, I know it	
24 Teams chat involving the social media		24 exists. I -- I didn't look too far into the	
25 communicators group chat.		25 merits of the campaign. I knew that it was	
	222		224
1 Q. Okay. And you do see there's a -- I		1 for a -- you know, specific-named primate in a	
2 think it looks -- Kelly T. Maybe we can zoom		2 UW research facility. But I didn't do much	
3 in on that, on Exhibit 39 here. Zoom in on		3 research into the -- the campaign itself.	
4 the Kelly T. comment. There's a screenshot.		4 Q. Well, how do you feel about Cornelias,	
5 Someone says [as read]:		5 aside from the campaign?	
6 "Release the Cornelias."		6 That's the monkey that's in the	
7 Do you see that, that screenshot that		7 research laboratory. Do you think things	
8 was shared in the chat?		8 about the -- about Cornelias?	
9 A. Yes, I do.		9 A. I don't really have a personal opinion	
10 Q. And you responded a couple of comments		10 on it.	
11 down [as read]:		11 All right. I'm just going to, quick,	
12 "Probably my favorite		12 turn a light on. It's getting kind of dark in	
13 comment of the year right		13 my office with the sun going down. Okay.	
14 there."		14 MR. BERRY: This is going to be	
15 A. Yes, I did.		15 the -- can we pull up...	
16 Q. Can you explain what the -- what you		16 BY MR. BERRY:	
17 mean by that?		17 Q. Well, actually, was there -- does the	
18 A. Sure. So the -- if you can zoom back		18 university never entirely turn off comments on	
19 in to the screenshot that Kelly T. shared, it		19 its -- any of its Instagram or Facebook posts?	
20 says [as read]:		20 STENOGRAFHER: I'm sorry?	
21 "Release the Cornelias."		21 BY MR. BERRY:	
22 And cor- -- a Cornelius is a type of		22 Q. Is there ever a time where the	
23 flower. And given my -- my educational		23 university turns off comments entirely for its	
24 background, I focused a lot in botany. I'm		24 Instagram or Facebook posts?	
25 familiar with the Cornelius flowers.		25 A. There had been instances of that	

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1 happening, yes.		1 and -- [indiscernible] -- saying [as read]:	
2 Q. And under what circumstances would		2 "Our -- our goal is an	
3 the -- would you decide to disallow comments		3 environment of decency,	
4 on an entire post?		4 quality and mutual respect	
5 A. Yeah. That happens very seldom.		5 for all human beings and	
6 There are -- there have been several instances		6 all other creatures"...	
7 of turning off comments on individual posts.		7 Is that correct?	
8 Just -- I think due to the nature of the		8 A. Yes.	
9 comments and -- and it was just unserviceable		9 Q. And would -- would comments about	
10 as a social media manager or in times of, you		10 animal research be on topic or off topic for	
11 know, like over the holidays if we're just		11 this post?	
12 very short staffed and -- and we don't really		12 A. Well, I -- I can't speak for all	
13 have staffing to keep eyes on the accounts.		13 comments. You know, it -- I would need to	
14 There was an instance this past		14 look at the contents of the comment.	
15 holiday season where we turned off comments on		15 But for mentioning all other creatures	
16 our moments in time, that's that		16 that they could be considered on topic.	
17 photographer -- photographer's choice year in		17 Q. And -- and I don't see any comments on	
18 review where, yeah, I -- I needed to take some		18 this post; that -- that's correct?	
19 time off and there was nobody else to fill in		19 A. Correct.	
20 for me, so, yeah.		20 Q. Would -- was this one of the posts	
21 Q. Okay. And, yet, if -- if comments are		21 where comments were disabled?	
22 blocked, that would mean that -- that even if		22 A. Yes.	
23 someone -- even if someone posted something		23 Q. And why -- why were comments disabled	
24 that was on topic, it would be automatically		24 for this post?	
25 blocked from appearing on the post; is that		25 A. Yeah. I -- I -- I don't recall. This	
	226		228
1 correct?		1 was -- you know, this was what, April 2020.	
2 A. They're just -- if -- if you turn off		2 So that was a little while ago. But as I	
3 a comment section, there's just no ability to		3 recall, there were many, many comments that it	
4 post a comment.		4 just -- it turned very ugly. You know,	
5 Q. Okay.		5 as -- as with -- as oftentimes comes with	
6 MR. BERRY: Can I have you -- okay.		6 animal research-type comments, there are	
7 This will be the last exhibit, and then we'll		7 threatening comments in there as well about,	
8 be done.		8 you know, burning in hell with so many	
9 Can we pull up the April 22, 2020,		9 different expletives and -- and, you know	
10 file and mark that as an exhibit.		10 comments of -- of that nature or wishing harm	
11 (Whereupon, Moll Deposition		11 upon researchers or -- or people just at the	
12 Exhibit No. 40 was marked		12 university.	
13 for identification.)		13 And looking at -- you know, this is	
14 TECHNICIAN: This is marked as		14 April 2020, which, you know, that was very	
15 Exhibit 40.		15 early into the COVID-19 pandemic. And this	
16 BY MR. BERRY:		16 was an incredibly stressful time to	
17 Q. And on Exhibit 40, do you		17 be -- well, anyone for that matter.	
18 recognize -- are you -- sorry, excuse me.		18 But especially, you know, as -- for	
19 This exhibit is marked 40. Are you		19 in my opinion, a social media manager. And so	
20 familiar with this document?		20 I believe, you know, at that time I didn't	
21 A. Yes, I am.		21 have the mental capacity to just handle those	
22 Q. And what is it?		22 types of comments.	
23 A. This is a screenshot of a UW-Madison		23 Q. Do you remember about -- do you	
24 Instagram post about Earth Day.		24 remember how many comments there were before	
25 Q. Okay. So it mentions Earth Day,		25 you turned the commenting off?	

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1 A. I don't.		1 MR. BERRY: Yeah. Plaintiff will do	
2 Q. Could you even -- could you even		2 that.	
3 hazard to guess in a ballpark how many		3 MR. KILPATRICK: And Defendant, too,	
4 comments there were before you turned it off?		4 but we'll just need electronic and condensed	
5 A. This is so long ago, I -- I don't		5 version, please, with exhibits.	
6 know.		6 MR. BERRY: Yeah. I'll have the same	
7 Q. Would those -- would those comments		7 way that Steven -- Steven wanted it.	
8 have been preserved anywhere or would they be		8 Whatever we did last week, I kind of	
9 viewable through your account administrator		9 want to do for this one. Yeah, we can just do	
10 access on the page?		10 the regular speed for now, and I'll contact	
11 A. I don't think so.		11 you if we want it faster.	
12 Q. Okay. All right.		12 * * * FURTHER DEPONENT SAITH NOT * * *	
13 A. I don't think so.		13 (Proceedings ended at 5:57 p.m.)	
14 MR. BERRY: All right. I'm done with		14	
15 my questions.		15	
16 MR. KILPATRICK: I just have one. And		16	
17 it's just a very quick clarifying one about an		17	
18 answer to a question, Christopher, you had		18	
19 posed.		19	
20 I'm going to ask that an exhibit be		20	
21 placed back up on the screen. I think it's		21	
22 25.		22	
23 Could you scroll down a bit so we		23	
24 could see the top?		24	
25 Sorry, other way. Yeah.		25	
	230		232
1 Okay.		1 STATE OF ILLINOIS)	
2 EXAMINATION		2) SS:	
3 BY MR. KILPATRICK:		3 COUNTY OF C O O K)	
4 Q. All right. Mr. Moll, do you remember		4 I, ANGELA C. LOISI, CSR, RPR, FCRR, an	
5 testifying about this?		5 Officer of the Court, do hereby certify that	
6 A. Yes, I do.		6 heretofore, to wit, on March 9, 2022,	
7 Q. And what is this again?		7 virtually appeared before me, from Cook	
8 A. This is a screenshot of an Instagram		8 County, Illinois, NATE MOLL, in a cause now	
9 comment section on a UW-Madison Instagram		9 pending and undetermined in the United States	
10 post.		10 District Court for the Western District of	
11 Q. Okay. So it was -- it's Instagram and		11 Wisconsin, wherein MADELINE KRASNO is the	
12 not Facebook?		12 plaintiff, and BOARD OF REGENTS OF THE	
13 A. Correct.		13 UNIVERSITY OF WISCONSIN is the defendant.	
14 MR. KILPATRICK: Okay. That's all I		14 I further certify that the said witness	
15 needed to know is.		15 acknowledged his testimony to be true under	
16 VIDEOGRAPHER: Is there anything else		16 the penalties of perjury in the cause	
17 to put on the record or shall we go off?		17 aforesaid; that the testimony then given by	
18 MR. BERRY: We can go off the record.		18 said witness was reported stenographically by	
19 MR. KILPATRICK: Yeah. I've got		19 me in the virtual presence of the said	
20 nothing further.		20 witness, and afterwards reduced to digital	
21 VIDEOGRAPHER: Okay. The time is		21 format by Computer-Aided Transcription, and	
22 5:55. We're off the record at the end of		22 the foregoing is a true and correct transcript	
23 recording 5.		23 of the testimony so given by said witness as	
24 STENOGRAPHER: And would anyone like		24 aforesaid.	
25 to order the transcript?		25 I further certify that the signature to	

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1 the foregoing deposition was waived for the
2 respective parties.

3 I further certify that the taking of this
4 deposition was pursuant to notice, and that
5 virtually present at the deposition were the
6 attorneys hereinbefore mentioned.

7 I further certify that I am not counsel
8 for nor in any way related to the parties to
9 this suit, nor am I in any way interested in
10 the outcome thereof.

11 IN TESTIMONY WHEREOF: I have hereunto set
12 my verified digital signature on

13 March 9, 2022.

14

15

16

17

18 *Angela C. Loisi*
19 _____

20 Angela C. Loisi, CSR, RPR, FCRR

21

22

23

24

25

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